



RECEIVED

DEC 23 1997

SUPERFUND DIVISION

A E STALEY MANUFACTURING COMPANY 2200 E ELDORADO STREET DECATUR ILLINOIS 62525 TELEPHONE 217 423 4411

December 23 1997

Pauletta France Isetts  
Superfund Division  
U S EPA Region VII  
726 Minnesota Avenue  
Kansas City Kansas 66101

Via Federal Express #7554790555

PCB Treatment Inc Superfund Site

Dear Ms France Isetts

Enclosed and returned to you is the Response to Information Request of A E Staley Manufacturing Company (Staley ) concerning the above site

Please be advised that Staley did not receive in the October 31 1997 letter from the United States Environmental Protection Agency a summary of the volume and nature of the substances allegedly contributed to the above site by Staley Therefore Staley is unable to comment upon this purported summary and reserves the right to comment upon any such summary in the future

Should you have any questions please contact me

Very truly yours

Marc W Larson  
Corporate Counsel

MWL/me

2015678



RESPONSE TO INFORMATION REQUEST  
PCB Treatment Inc Sites

A E Staley Manufacturing Company ( Staley )

December 23 1997

1 Marc W Larson Corporate Counsel A E Staley Manufacturing Company 2200  
E Eldorado St Decatur IL 62521 telephone (217) 421 2130 fax (217) 421 4507

2 Marc W Larson Corporate Counsel A E Staley Manufacturing Company 2200  
E Eldorado St Decatur IL 62521 telephone (217) 421 2130 fax (217) 421 4507

3 The following persons were consulted in the preparation of the answers to this  
request Lynn Elder Manager Energy Purchasing and Environmental and Richard L  
Dickinson Sr Environmental Engineer Both can be reached by contacting Marc W  
Larson Corporate Counsel A E Staley Manufacturing Company 2200 E Eldorado St  
Decatur IL 62521 telephone (217) 421 2130 fax (217) 421 4507

4 January 1 1982 to December 30 1987 A E Staley Manufacturing Company  
December 31 1987 Staley Continental Inc

5 Except for the documents identified as Staley Documents numbered pages  
S000001 S000004 Staley has no information that any of its current or former employees  
have any knowledge information or documents about the generation use purchase  
treatment storage disposal or other handling of materials equipment or items at or  
transportation of materials equipment or items to the Sites There are no legible names  
on pages S000001 and S000002 and the names on page S000004 are Randy Stebbings  
Laboratory Manager Joe Kelly Manager Environmental Affairs and Dana S Myers  
President all of whom apparently are S D Myers Inc employees The name on page  
S000005 (Lynn Elder) has no additional knowledge information or documents

6 Staley did not make any arrangements for transportation of materials equipment  
or items taken to the Sites Staley had two contracts with S D Myers Inc which is  
named on page S000001 of the Staley Documents The contracts are dated October 10  
1985 and March 12 1986 and cover the retrofill and disposal of transformers containing  
PCBs All Staley Documents relating to S D Myers Inc including the contracts are  
numbered pages S000001 S000071

7 Staley did not make any arrangements for the storage treatment or disposal of  
materials or items at the Sites Staley had two contracts with S D Myers Inc which is  
named on page S000001 of the Staley Documents The contracts are dated October 10  
1985 and March 12 1986 and cover the retrofill and disposal of transformers containing

PCBs All Staley Documents relating to S D Myers Inc including the contracts are numbered pages S000001 S000071

8 Staley did not transport any material equipment or items or make any arrangements for transportation of material equipment or items to PCB Treatment Inc Page S000001 of the Staley Documents indicates there may have been a shipment made to PCB Treatment Inc Staley had two contracts with S D Myers Inc which is named on Page S000001 of the Staley Documents The contracts are dated October 10 1985 and March 12 1986 and cover the retrofill and disposal of transformers containing PCBs All Staley Documents relating to S D Myers Inc including the contracts are numbered pages S000001 S000071

9 Staley did not make any arrangements for the storage treatment or disposal of material equipment or items at PCB Treatment Inc Page S000001 of the Staley Documents indicates there may have been disposal at PCB Treatment Inc Staley had two contracts with S D Myers Inc which is named on page S000001 of the Staley Documents The contracts are dated October 10 1985 and March 12 1986 and cover the retrofill and disposal of transformers containing PCBs All Staley Documents relating to S D Myers Inc including the contracts are numbered pages S000001 S000071

10 Except for the documents identified as Staley Documents numbered pages S000001 S000004 and information received from the United States Environmental Protection Agency in its October 31 1997 mailing to Staley Staley has no information or knowledge relating to PCB Treatment Inc

11 Except for the documents identified as Staley Documents numbered pages S000001 S000004 and information received from the United States Environmental Protection Agency in its October 31 1997 mailing to Staley Staley has no information or knowledge relating to the handling or transportation of material equipment or items between the Wyandotte Street and Ewing Street Sites by any person and the purpose for such movement of material equipment or items between the Sites

12 Staley has no information or knowledge relating to the rejection of any materials equipment or items from the Sites

13 Staley did not ship any material equipment or item to the Sites Except for the documents identified as Staley Documents numbered pages S000001 S000004 and information received from the United States Environmental Protection Agency in its October 31 1997 mailing to Staley Staley has no information or knowledge relating to shipments to the Sites

14 Staley did not ship any material equipment or item to the Sites Except for the documents identified as Staley Documents numbered pages S000001 S000004 and information received from the United States Environmental Protection Agency in its

October 31 1997 mailing to Staley Staley has no information or knowledge relating to shipments to the Sites

15 Staley did not ship any material equipment or item to the Sites Except for the documents identified as Staley Documents numbered pages S000001 S000004 and information received from the United States Environmental Protection Agency in its October 31 1997 mailing to Staley Staley has no information or knowledge relating to shipments to the Sites

16 The Staley Documents contain the following EPA RCRA Identification Numbers

A E Staley Manufacturing Company  
E Post Road  
Morrisville PA 19067  
PAD061805404

S D Myers Inc  
1500 Commerce Drive  
Stow OH 44224  
OHD044946127

ENSCO Inc  
American Oil Road  
El Dorado AR 71750  
ARD069748192

Chicago Industrial Waste Haulers  
[No address given]  
ILD980794960

PCB Inc  
45 Erving  
Kansas City KS 66108  
KSD980963565

17 Staley has no additional information other than what is contained in this Response

### VERIFICATION

The undersigned Marc W Larson states that he is Assistant Secretary and Corporate Counsel of A E Staley Manufacturing Company the above named respondent that he is authorized to make this verification for and on its behalf and that he is informed and believes and on that ground alleges that the matters stated above are true and accurate to the best of the knowledge of A E Staley Manufacturing Company

*Marc W Larson*

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Marc W Larson

1986

chd mwy 8602306/6/86

Form Approved OMB No 2000 0404 E p 73 86

Please type (F made gned for se on ell (12 p l h) typew l )

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1 Generator's US EPA ID No <b>OHDO44946127</b>		Manifest Document No <b>86-0206-0</b>		2 Page 1 of 1		Information the shaded areas is not required by Federal law							
3 Generator's Name and Mailing Address <b>S D MYERS, INC</b> <b>P O BOX 4724, AKRON, OH 44310</b>						A State Manifest Document Number									
4 Generator's Phone ( <b>216</b> ) <b>633-2666</b>						B State Generator's ID									
5 Transporter 1 Company Name <b>CHICAGO INDUSTRIAL WASTE HAULERS</b>				6 US EPA ID Number <b>ILD980794960</b>		C State Transporter's ID <b>50521HW</b>									
7 Transporter 2 Company Name				8 US EPA ID Number		D Transporter's Phone <b>816-472-1466</b>									
9 Designated Facility Name and Site Address <b>PCOB INC</b> <b>45 ERVING</b> <b>KANSAS CITY, KANSAS 66108</b>				10 US EPA ID Number <b>KSD980963565</b>		E State Transporter's ID									
						F Transporter's Phone									
						G State Facility's ID <b>KSD980963565</b>									
						H Facility's Phone <b>913-371-4058</b>									
11 US DOT Description (Including Proper Shipping Name Hazard Class and ID Number)						12 Containers No Type		13 Total Quantity		14 Unit Wt/Vol		15 Waste No			
a <b>X</b> <b>WASTE POLYCHLORINATED BIPHENYL-transformer oil less than 1,000ppm ORM-E UN2315 RQ</b>						1		TT		5,000		G			
b															
c															
d															
J Additional Descriptions for Materials Listed Above						K Handling Codes for Wastes Listed Above <b>Detox</b>									
15 Special Handling Instructions and Additional Information <b>WORK ORDER NO 8652</b> <b>PURCHASE ORDER NO OH31739</b> <b>MULTIPLE GENERATORS: See attached Bill of Lading</b>															
16 GENERATOR'S CERTIFICATION I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and a classified packed marked and labeled a date all aspects proper condition for transport by highway according to applicable international and national government regulations Unless I am a small quantity generator who has been exempted by statute or regulation from the duty to make a waste minimization certification under Section 3002(b) of RCRA I also certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and I have selected the method of treatment storage or disposal currently available to me which minimizes the present and future threat to human health and the environment															
Printed/Typed Name						Signature						Month Day Year			
17 Transporter 1 Acknowledgement of Receipt of Materials						Printed/Typed Name						Signature		Month Day Year	
18 Transporter 2 Acknowledgement of Receipt of Materials						Printed/Typed Name						Signature		Month Day Year	
19 Discrepancy Indication Space															
20 Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19						Printed/Typed Name						Signature		Month Day Year	

folior

S000001

D ubly l ca ion nd ar on d B ond on med b b m d d p p y l be  
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180 South Ave Tallmadge OH 44278 19 86 DFGN TEWT N( ) BY TRUCK ☐ FREIGHT ☐ Shipper's No \_\_\_\_\_

Consigned to PCB Inc

Route	45 Erving	Kansas City	Kansas	66108
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N P k ges	HM	DESCRIPTION AND CLASSIFICATION				UN#	W g (S b Cor)	C R	C C m	Subje t t Se ion 7 t cond on of p p c a b l e b i l l i a d i n g i f t s h i p m e n t b e d e v e r e d c o n g n o r e e w t h o u e c o u r o n t h e c o n g n o r t h c o n g n o r s h a l l g t h e f o l l o w i n g t a e m e n t T h c a r e r s h a l l n o t m a k e d e l i v e r y o f t s h i p m e n t w i t h o u t p a y m e n t o f l i g h t a n d t h e r e f u l q u e s
		Identifica	P op	Sh p p g N m	C i d					
1	X	Tanker-waste polychlorinated biphenyl - transformer oil								P (Signa of Co g n o r) I f h g t b e p e a i d w r o t a m p h e r t b e p e a i d
		less than 1 000ppm ORM-E UN2315 RQ WORK ORDER #8652								
		96 drums - 5 280 gallons								R e c e i v e d \$ T o a p p l y i n p p y m e n t t h e c h a r g e s o n t h e p r o p e r t y d e b e d t h e r e o n A g e n o r C i e P (T g h n k n o w d g o n l y t m o u p p a i d) C g A d e d
		(17) Vista Chemical Westlake LA FS 85-150 5/1/86 -								
		(7) Eastern Rock Products Jordanville, NY FS NYA2022692-6 3/17/86								<b>C O D S H I P M E N T</b> P r e p a i d <input type="checkbox"/> C o l l e c t <input type="checkbox"/> \$ C o l l e c t i o n F e e T o t a l C h a r g e s I f t h i p m e n t m o v e s b e t w e e t w o p o r t s b y c a m b y w i t h l i w e q t h i b i l l o f l a d i n g s h a l l t a t w t h C a n e S h i p p e r w e i g h t t S h i p p e i m p r i t i l o f t a m p n o t p a r t t b i l l i a d i g a p p e d b y t h D e p a r t m e n t f T r a n s p o r t a l N O T E - W h e r e t h i d e p e n d e t o n t h e s h i p p e r a r q u e d t i l p e c f i c a l l y i n w r i t i n g t h g e d d e c l a r e d v a l t h p r o p r t y T H I S S H I P M E N T I S C O R R E C T L Y D E S C R I B E D C O R R E C T W E I G H T I S L B S S b j e t t o n b y t R p e c W g g n d i p o n
		(17) Chrysler Kokomo IN FS 86-014 2/22/86 -								
		(21) A E Staley Morrisville PA FS 86-018 4/2/86 -								
		(6) Owens Illinois Pittston PA FS PAB2957710 1/22/86 -								
		(3) Merryweattler Foam Barberton OH FS 85-160 1/26/86 -								
	Y	(1) Chrysler Warren MI PG PG-0613-7 1/24/86								
	Y	(3) Reedy Creek Utilities Lake Buena Vista FL PG-0617-7 3/17/86								
		(2) Eldred Division of Ethan Allen Eldred PA FS 85-047 2/1/86								
		(9) Community Mutual Ins Co Worthlington OH FS 86-026 4/7/86 -								
		(3) Faultless Rubber Ashland OH FS 86-028 4/11/86								
	X	(4) Great Lakes Carbon Morganton, NC PG 86-0205-46								
		(3) C E I Cleveland OH FS 86-035 4/28/86 -								

TOTAL PIECES	S.D.M. - 2 - 1/2						B	A ord gl Ag eeme l
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S000002

1

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ta on cording l plicable regu  
lations of the Department of Transpor  
ta on

November 7 1997

A E Staley Manufacturing Co  
2200 E Eldorado  
Decatur IL 62525  
Attn Lynn Elder

Dear Mr Lynn Elder

Subject U S EPA Region VII – PCB Treatment Inc

You may have recently received a letter from the Superfund Division United States Environmental Protection Agency Region VII (U S EPA) requesting information concerning your company and PCB disposal at PCB Treatment Inc (PCBTI) This letter may also refer to S D Myers Inc as the source of information that U S EPA used to determine that your company was a potentially responsible party at the PCBTI sites The main purpose of our letter to you at this time is to give you some background on this situation Also we want to offer you additional information that we have supplied to U S EPA Finally we want to assure you that we at S D Myers Inc fully intend to honor our financial and contractual obligations to you

S D Myers Inc did not volunteer information concerning your company nor did we suggest that U S EPA consider you to be a potentially responsible party We responded to a Request for Information (RFI) issued under the Superfund program Your company's name was part of our response because it was included in documents that S D Myers Inc was required by law to send to U S EPA We conclude from subsequent events that U S EPA used those documents as one information source among several to identify your company as a party from whom they require further information

The background on this situation as we understand it is as follows During the 1980's PCB Treatment Inc operated two sites for PCB disposal and storage in the Kansas City area PCBTI went out of business in 1987 and U S EPA has subsequently determined that the sites are contaminated by PCBs and that the current owners of the properties are either unwilling or unable to clean them up U S EPA is using the Superfund laws to effect a clean up of the two sites and to assign financial liabilities so that the government's clean up expenditures are recovered from responsible parties who used the sites for disposal To the best of our knowledge there are no PCB materials from generators still at the site only residual PCB contamination from disposal and storage activities and from an attempted clean up

Between March 1986 and February 1987 S D Myers Inc sent several loads of transformer oil contaminated with relatively low concentrations of PCBs to the Ewing Street facility for disposal At the time of our shipments the facility and process that PCBTI operated at Ewing Street were approved and permitted by U S EPA under TSCA for this type of disposal work We never sent any materials other than oil Later PCBTI's permits were not renewed and the company went out of business







In July 1997 U S EPA sent S D Myers Inc a Request for Information letter in accordance with the Superfund rules In late August after being granted a short time extension we answered U S EPA providing them all the information and documentation that we were able to identify from our records concerning PCBTI In early October in response to a second letter listing us as a PRP we corrected mistakes that U S EPA had in their database by providing some clarifications of the information that we had sent them in August

At your request we will send you the relevant information that we provided to U S EPA concerning these shipments Randy Stebbins in our laboratory will be responsible for extracting and copying information from our files We will forward all information that we have concerning materials we sent to PCBTI that originated at your facility

We do not expect that this situation will be resolved or that liabilities will be completely determined by U S EPA any time soon However only a very small amount of PCBs (<200 pounds) was contained in our shipments to PCBTI and our total shipments represent only about 1% of all the materials sent to these sites Naturally the shipments pertaining to your company or to any one of our customers would be considerably smaller Further we have had a team from our PCB remediation department go through and test both sites We estimate that the removal project could cost \$6 million Tripling this amount to allow for the delays and higher pricing that are frequently brought on by Superfund requirements is reasonable and still results in worst case exposure for S D Myers Inc of about \$200 000 Responsibility for the material originating at your facility would be part of this amount our share of the clean up bill

**You sent us materials for disposal and paid us for the disposal We feel that you have already paid once for destroying these PCBs and we assume the financial responsibility for any materials listed on our manifests to PCBTI that you sent us which we in turn sent to PCB Treatment Inc**

If there are any questions concerning this letter or if we can provide you with more information please contact us through your S D Myers Inc salesperson Also you may call Mr Randy Stebbins Laboratory Manager at (330) 630 7000 Extension 3359 or Mr Joe Kelly Manager Environmental Affairs at Extension 3210 Please be advised that their travel schedules in the last two weeks of this month may cause some delays in assembling and forwarding information from our files to you and consider this in the context of any deadlines you may have for responding to U S EPA s letter

Sincerely

A handwritten signature in black ink, appearing to read 'Dana S. Myers'.

Dana S Myers  
President

S000004

TO

Dan Taylor

FROM

K Obuszcwski



Staley

A E STALEY MFG CO

EAST POST ROAD

MORRISVILLE PENNSYLVANIA 19067

SUBJECT

PCB Test

DATE

6/18/83

REPLY NECESSARY

☐ YES

☐ NO

MESSAGE

Dan

Attached are the test results we discussed on the phone. I will send you the retest results when I receive them. Included are the previous test results.

SIGNED

K Obuszcwski

REPLY

TO

DATE

SIGNED

THIS FORM HAS BEEN DESIGNED TO SPEED TRANSMISSION OF INFORMATION

RELAY MAY BE TYPED OR HAND WRITTEN TO AVOID DELAY

KWIKLETTER

SAVE ENVELOPE TYPING FOLD FORM AT ARROWS AND INSERT IN A WINDOW ENVELOPE

00

S000005

LOCATION OF TRANSFORMER

ACIS 4 12

70302-13

TC	NUMBER	14
----	--------	----

Substation Name or Number US1

**DIVISION OF  
SOLVERS**

# TRANSFORMED CONSULTANTS

☐ Indoor    ☐ Roof  
☒ Outdoor    ☐ Pole  
☒ Ground    ☐ Platform    F1

Unit Or Tag Number \_\_\_\_\_

## NAMEPLATE INFORMATION

Manufacturer	West	Primary Volts	13800	Gal	281	<input checked="" type="checkbox"/> On
Serial Number	PAV3036-01	Secondary Volts	480	Impedance	5 37	<input type="checkbox"/> Askarel
KVA Rating	2000	Phase/Cycle	3/60	Other		

Radiators ☒ Yes ☐ No      Conservator Tank ☐ Yes ☒ No      Top Valve None      Access bility - P w      P w      H

Fans ☐ Yes ☒ No      Tap Changer Comp ☐ Yes ☒ No      Bottom Valve 1      Testing ☐      P w      H

H<sub>2</sub>O Cooled ☐ Yes ☒ No      Bushings ☐ Top ☒ Side      Other Access 1' cap      ReRef ☒      P w      H

Other ☐      P w      H

ReRef n ng Parking ☒ Y ☐ N Hose distance good Feet Power 3 ☒ Y ☐ N Voltage ☐ 220/240 ☐ 440/480

## TRANSFORMER LIQUID TEST DATA

	DATE	S	LEVEL	TEMP	P V	DIEL	ACID	IFT	COLOR	SPECIFIC GRAVITY	VISUAL	LEAKS	PAINT	OIL CLASS	RECOMMEND
1	5-83	MTL	N	35	0	42	0.04	33.4	2.0	0.875	Clr	None	Fair	Good	Retest 1 yr
2															
3															
4															
5															
6															
7															
8															
9															
10															
11															
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16															
17															
18															
19															
20															
21															
22															
23															
24															
25	5-83					PCB CONTENT TESTED BY ELECTRON CAPTURE								724 PPM	Yellow Label

ACT  
DIVISION OF  
FD-100

## TRANSFORMER CONSULTANTS

S000006

# LOCATION OF TRANSFORMER

Acts 4 12

70302-13

TC NUMBER 15



Substation Name or Number \_\_\_\_\_

T1

Unit Or Tag Number \_\_\_\_\_

☐ Indoor ☐ Roof  
☒ Outdoor ☐ Pole  
☒ Ground ☐ Platform Fr

## NAMEPLATE INFORMATION

Manufacturer West Primary Volts 34500 Gal 700 ☒ Oil ☐ Askarel  
 Serial Number PAP11752 Secondary Volts 13800 Impedance 6 1%  
 KVA Rating 3333 Phase/Cycle 1/60 Other \_\_\_\_\_

Radiators ☒ Yes ☐ No Conservator Tank ☐ Yes ☒ No Top Valve 1 Accessibility - P w P w (f)  
 Fans ☒ Yes ☐ No Tap Changer Comp ☐ Yes ☒ No Bottom Valve 2 Testing ☐  
 H<sub>2</sub>O Cooled ☐ Yes ☒ No Bushings ☒ Top ☐ Side Other Access \_\_\_\_\_ ReRef ☒  
 ReRef ning Parking ☒ Y ☐ N Hose distance good Feet Power 3 ☒ Y ☐ No Voltage ☐ 220/240 ☐ 440/480

## TRANSFORMER LIQUID TEST DATA

	DATE	S	LEVEL	TEMP	P V	DIEL	ACID	IFT	COLOR	SPECIFIC GRAVITY	VISUAL	LEAKS	PAINT	OIL CLASS	RECOMMEND
1	5-83	MTL	N	28	0	41	0 03	37 7	1 0	0 880	Clr	None	Fair	Good	Retest 1 yr
2	5-83	GC				DISSOLVED	GASES	TESTED BY GAS CHROMATOGRAPHY							Retest 1 yr
3															
4															
5															
6															
7															
8															
9															
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24															
25	5-83					PCB CONTENT	TESTED BY ELECTRON CAPTURE							167 PPM	Orange Label

ACTS 12



S000007

Customer A E Staley

City Morrisville

State PA

## LOCATION OF TRANSFORMER

Acts 4 12

70302-13

TC NUMBER 16

Substation Name or Number

T2

Unit Or Tag Number

DIVISION OF  
EDMayersTRANSFORMER  
CONSULTANTS

☐ Indoor ☐ Roof  
☒ Outdoor ☐ Pole  
☒ Ground ☐ Platform Ft

## NAMEPLATE INFORMATION

Manufacturer West Primary Volts 34500 Gal 700 ☒ Oil ☐ Askarel  
Serial Number PAP11753 Secondary Volts 13800 Impedance 6 1%  
KVA Rating 3333 Phase/Cycle 1/60 Other

Radiators ☒ Yes ☐ No Conservator Tank ☐ Yes ☒ No Top Valve 1 Accessibility - P w P w ff  
Fans ☒ Yes ☐ No Tap Changer Comp ☐ Yes ☒ No Bottom Valve 2 Testing ☐  
H<sub>2</sub>O Cooled ☐ Yes ☒ No Bushings ☒ Top ☐ Side Other Access Other  
ReRef ning Parking ☒ Y ☐ N Hose distance good Feet Power 3 ☒ Y ☐ N Voltage ☐ 220/240 ☐ 440/480

## TRANSFORMER LIQUID TEST DATA

	DATE	S	LEVEL	TEMP	P V	DIEL	ACID	IFT	COLOR	SPECIFIC GRAVITY	VISUAL	LEAKS	PAINT	OIL CLASS	RECOMMEND
1	5-83	MTL	N	28	0	45	0 03	35 4	2 0	0 880	Clr	None	Fair	Good	Retest 1 yr
2	5-83	GC				DISSOLVED GASES TESTED BY GAS CHROMATOGRAPHY									Retest 1 yr
3															
4															
5															
6															
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23															
24															
25	5-83					PCB CONTENT TESTED BY ELECTRON CAPTURE							47 PPM	Orange Label	

AC 12  
DIVISION OF  
EDMayersTRANSFORMER  
CONSULTANTS

S000008

## LOCATION OF TRANSFORMER

Acts 4 12

70302-13

TC NUMB R 17

Substation Name or Number

T3

Unit Or Tag Number

DIVISION OF  
ED Myers TRANSFORMER  
CONSULTANTS☐ Indoor ☐ Roof☒ Outdoor ☐ Pole☒ Ground ☐ Platform Fl

## NAMEPLATE INFORMATION

Manufacturer West

Primary Volts 34500

Gal 700

☒ Oil☐ Askarel

Serial Number PAP11751

Secondary Volts 13800

Impedance 6 1%

KVA Rating 3333

Phase/Cycle 1/60

Other

Radiators ☒ Yes ☐ NoConservator Tank ☐ Yes ☒ No Top Valve 1

Accessibility - P w P w H

Fans ☒ Yes ☐ NoTap Changer Comp ☐ Yes ☒ No Bottom Valve 2Testing ☐ReRef ☒H<sub>2</sub>O Cooled ☐ Yes ☒ NoBushings ☒ Top ☐ Side

Other Access

Other

ReRef n ng Parking ☒ Y ☐ N

Hose distance good

Feet

Power 3 ☒ Y ☐ NVoltage ☐ 220/240 ☐ 440/480

## TRANSFORMER LIQUID TEST DATA

	DATE	S	LEVEL	TEMP	P V	DIEL	ACID	IFT	COLOR	SPECIFIC GRAVITY	VISUAL	LEAKS	PAINT	OIL CLASS	RECOMMEND
1	5-83	MTL	N	27	-1	49	0 02	36 2	1 5	0 870	Clr	None	Fair	Good	Retest 1 yr
2	5-83	GC				DISSOLVED GASES TESTED BY GAS CHROMATOGRAPHY									Retest 1 yr
3															
4															
5															
6															
7															
8															
9															
10															
11															
12															
13															
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15															
16															
17															
18															
19															
20															
21															
22															
23															
24															
25	5-83					PCB CONTENT TESTED BY ELECTRON CAPTURE								42 PPM	Green Lab

DIVISION OF  
ED Myers TRANSFORMER  
CONSULTANTS

S000009

# LOCATION OF TRANSFORMER

Acts 4 12

70302-13

TC NUMBER 18

Substation Name or Number \_\_\_\_\_  
T4

**DIVISION OF**  
**ED Myers** **TRANSFORMER**  
**CONSULTANTS**

☐ Indoor ☐ Roof  
☒ Outdoor ☐ Pole  
☒ Ground ☐ Platform Fr

Unit Or Tag Number \_\_\_\_\_

## NAMEPLATE INFORMATION

Manufacturer West Primary Volts 34500 Gal 817 ☒ Oil ☐ Askarel  
Serial Number UAV4588-01 Secondary Volts 13800 Impedence 6 98%  
KVA Rating 3333 Phase/Cycle 1/60 Other \_\_\_\_\_

Radiators ☒ Yes ☐ No Conservator Tank ☐ Yes ☒ No Top Valve 1 Access bility - P w P w H  
Fans ☒ Yes ☐ No Tap Changer Comp ☐ Yes ☒ No Bottom Valve 2 Testing ☐  
H<sub>2</sub>O Cooled ☐ Yes ☒ No Bushings ☒ Top ☐ Side Other Access \_\_\_\_\_ ReRef X8  
ReRef ning Parking ☒ Y ☐ N Hose distance good Feet Power 3 ☒ Y ☐ N Voltage ☐ 220/240 ☐ 440/480

## TRANSFORMER LIQUID TEST DATA

	DATE	S	LEVEL	TEMP	P V	DIEL	ACID	IFT	COLOR	SPECIFIC GRAVITY	VISUAL	LEAKS	PAINT	OIL CLASS	RECOMMEND
1	5-83	MTL	N	34	+2	45	0 03	33 7	1 5	0 880	Clr	None	Fair	Good	Retest 1 yr
2	5-83	GC				DISSOLVED	GASES	TESTED BY	GAS CHROMATOGRAPHY						Retest 6 mos
3															
4															
5															
6															
7															
8															
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19															
20															
21															
22															
23															
24															
25	5-83					PCB CONTENT	TESTED BY	ELECTRON CAPTURE						348 PPM	Orange Label

**DIVISION OF**  
**ED Myers** **TRANSFORMER**  
**CONSULTANTS**

S000010

Home

A E Staley

City Morrisville

State

PA

LOCATION OF TRANSFORMER

Acts 4 12

70302 13

TC NUMBER 19

**DIVISION OF ED Myers TRANSFORMER CONSULTANTS**

Substation Name or Number

T5

Unit Or Tag Number

☐ Indoor ☐ Roof

☒ Outdoor ☐ Pole

☒ Ground ☐ Platform ☐ Ft

NAMEPLATE INFORMATION

Manufacturer West Primary Volts 34500 Gal 575 ☒ Oil ☐ Askare

Serial Number UCV6412-0201 Secondary Volts 13800 Impedance 6 1%

KVA Rating 3333 Phase/Cycle 1/60 Other

Radiators ☒ Yes ☐ No Conservator Tank ☐ Yes ☒ No Top Valve 1 Accessibility - P w P w H

Fans ☒ Yes ☐ No Tap Changer Comp ☐ Yes ☒ No Bottom Valve 2 Testing ☐

H<sub>2</sub>O Cooled ☐ Yes ☒ No Bushings ☒ Top ☐ Side Other Access ☒ ReRef ☒

ReRef n ng Parking ☒ N Hose d stance good Feet Power 3 ☒ Y ☐ N Voltage ☐ 220/240 ☐ 440/480

TRANSFORMER LIQUID TEST DATA

	DATE	S	LEVEL	TEMP	P V	DIEL	ACID	IFT	COLOR	SPECIFIC GRAVITY	VISUAL	LEAKS	PAINT	OIL CLASS	RECOMMEND
1	5-83	MTL	N	30	-1½	47	0 02	36 8	0 5	0 880	Clr	None	Good	Good	Retest 1 y
2	5-83	GC				DISSOLVED GASES TESTED BY GAS CHROMATOGRAPHY									Retest 1 y
3															
4															
5															
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22															
23															
24															
25	5 83					PCB CONTENT TESTED BY ELECTRON CAPTURE								2 PPM	Green Label

AC 5

**DIVISION OF ED Myers TRANSFORMER CONSULTANTS**

S000011



## LOCATION OF TRANSFORMER

Acts 4 12

70302-13

T

UMBER 20

Substation Name or Number

T6

DIVISION OF  
ED MyersTRANSFORMER  
CONSULTANTS☐ Indoor ☐ Roof☒ Outdoor ☐ Pole☒ Ground ☐ Platform Ft

Unit Or Tag Number

## NAMEPLATE INFORMATION

Manufacturer West

Primary Volts 34500

Gal 817

☒ Oil☐ Askarel

Serial Number UAV4588-02

Secondary Volts 13800

Impedance 6 98%

KVA Rating 3333

Phase/Cycle 1/60

Other

Radiators ☒ Yes ☐ NoConservator Tank ☐ Yes ☒ No

Top Valve 1

Accessibility - P w P w ft

Fans ☒ Yes ☐ NoTap Changer Comp ☐ Yes ☒ No

Bottom Valve 2

Testing ☐ReRef ☒H<sub>2</sub>O Cooled ☐ Yes ☒ NoBushings ☒ Top ☐ Side

Other Access

Other

ReRef n ng Parking ☒ Y ☐ N

Hose distance good

Feet

Power 3 ☒ Y ☐ No

Voltage

☐ 220/240 ☐ 440/480

## TRANSFORMER LIQUID TEST DATA

	DATE	S	LEVEL	TEMP	P V	DIEL	ACID	IFT	COLOR	SPECIFIC GRAVITY	VISUAL	LEAKS	PAINT	OIL CLASS	RECOMMEND
1	5-83	MTL	N	37	+1	46	0 02	36 5	0 75	0 875	Clr	None	Fair	Good	Retest 1 yr
2	5-83	GC				DISSOLVED	GASES	TESTED BY	GAS CHROMATOGRAPHY						Retest 1 yr
3															
4															
5															
6															
7															
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19															
20															
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22															
23															
24															
25	5 83					PCB CONTENT	TESTED BY	ELECTRON CAPTURE		1228 PPM	Yellow Labe				

ACT 12

DIVISION OF  
ED MyersTRANSFORMER  
CONSULTANTS

S000012

## LOCATION OF TRANSFORMER

Acts 4 12

70302-13

TC NUMBER 21

Substation Name or Number

T7 Spare

DIVISION OF  
EDMVERSTRANSFORMER  
CONSULTANTS
☐ Indoor ☐ Roof  
☒ Outdoor ☐ Pole  
☒ Ground ☐ Platform Fr

Unit Or Tag Number

## NAMEPLATE INFORMATION

Manufacturer West

Primary Volts 34500

Gal 817

☒ Oil☐ Askarel

Serial Number UAV4588-03

Secondary Volts 13800

Impedance 6 94%

KVA Rating 3333

Phase/Cycle 1/60

Other

Radiators ☒ Yes ☐ NoConservator Tank ☐ Yes ☒ No

Top Valve 1

Access bility - P w P w H

Fans ☐ Yes ☒ NoTap Changer Comp ☐ Yes ☒ No

Bottom Valve 2

Testing ☐ReRef ☒H<sub>2</sub>O Cooled ☐ Yes ☒ NoBushings ☒ Top ☐ Side

Other Access

Other

ReRef n ng Parking ☒ Y ☐ N

Hose distance good

Feet

Power 3

☒ Y ☐ N

Voltage

☐ 220/240☐ 440/480

## TRANSFORMER LIQUID TEST DATA

	DATE	S	LEVEL	TEMP	P V	DIEL	ACID	IFT	COLOR	SPECIFIC GRAVITY	VISUAL	LEAKS	PAINT	OIL CLASS	RECOMMEND
1	5-83	MTL	N		+1	40	0 02	33 5	0 75	0 880	Clr	None	Good	Good	Retest 1 yr
2	5 83	GC				DISSOLVED	GASES	TESTED BY	GAS CHROMATOGRAPHY						Retest 1 yr
3															
4															
5															
6															
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23															
24															
25	5 83					PCB CONTENT	TESTED BY	ELECTRON CAPTURE						12 PPM	Green Label

AC  
DIVISION OF  
EDMVERSTRANSFORMER  
CONSULTANTS

S000013

TO *Ken Churgewski - Marrisonville* FROM**A E STALEY MFG CO****2200 EAST ELDORADO STREET****DECATUR ILLINOIS 62525**SUBJECT *PCB Destruction, Etc*DATE *3/12/84*

REPLY NECESSARY

☒ YES ☐ NO

## MESSAGE

*Transformer Consultants now have Pa. permit in hand for their PCB-Gone destruction system. Please contact your East coast TC rep. for quotation update on the PCB contaminated transformers - Let me know if it looks good & we'll plan way to help convince local officials to give fast approval so it won't take up to 90 days allowed for the regional-local approval process on site specific applications. Have the wet mill/bleach EER room been enclosed yet? Please give me note on status.*

SIGNED *Dan Taylor*  
DATE

*4/13 They have contacted TC for new price proposal. Will then write AFE for all work incl wet mill/bleach EER room enclosure. Will let u know who quote rec'd & if need any further help.*

SIGNED

S000014

TO *Ken Oburgowski - Morrisville* FROM**A E STALEY MFG CO**

2200 EAST ELDORADO STREET

DECATUR ILLINOIS 62525

SUBJECT *PCB Destruction, Etc*DATE *2/8/84*

REPLY NECESSARY

☒ YES ☐ NO

## MESSAGE

*Transformer Consultants now have Pa-approval for their application to use the PCB-Gone destruction system in the state. A permit is supposed to be issued within the next few weeks. Once it is, I'll let you know. Contact w TC can again be made to get a prize for destroying the PCB's in your contaminated municipal filled transformers. If that looks good, it would still take about 90 days after receipt of order B4 TC could do the work. Have the wetwell/phl hse EER rooms been enclosed yet?*

REPLY

TO

*Don Taylor*

DATE

SIGNED

S000015

TO

*Ken Stanger aka -  
Marshall*

FROM

**A E STALEY MFG CO**

2200 EAST ELDORADO STREET

DECATUR ILLINOIS 62525

SUBJECT

*FCR Distribution - Mineral  
Oil-filled Transformers*

DATE 12/2/83

REPLY NECESSARY

☐ YES ☒ NO

MESSAGE

*Transformer Consultants have been thrown some  
new bureaucratic curves by Pa authorities. They'll  
get it whipped & obtain approval for their process  
in Pa eventually but say to check back in couple  
months. I'll do that & keep you posted. Please  
let me know when you complete the enclosure  
work on EER rooms in wet mill & let those*

SIGNED

*Alan Taylor*

REPLY

TO

DATE

SIGNED

S000016

MEMORANDUM OF CONFERENCE

Person(s) Joe Kelly - Transformers  
Consultants 800-321-9580

by Daniel L Taylor

Telephone X

Date 12/2/83

In Person \_\_\_\_\_

Re PCB Destruction Process In  
Pa.

\* \* \* \* \*

Remarks Pa Authorities have thrown application back  
with need to have process certified by Pa registered  
Prof Eng TC couldn't find PE willing to make certi-  
fication due to potential liability so are having their  
own PE get registered in Pa Figure it'll be a couple  
more months to get that done.

12/3/84 Have been told Pa has approved application & state per-  
mit will be issued presumably within next couple weeks.  
Once permitted, will have to approach state regional people  
(6 regions) for each specific job, they in turn must give indi-  
vidual municipality up to 60 days to review (under State  
Solid Waste Laws/Regs) Joe will have someone at TC to call  
me when permit arrives - I made note to ck w Joe 4/9/84  
if I've not heard

5000017

158	132	44	00	270	300	23424		1		MEPRELL	MIRPELL	5185
10/10/85		EXEMPT		NET 30			SOUTHE		185-M8184			
10, 85		YOUR TRUCK		OUR PLANT			EXP CODE		AREA 5-A			



TRANSFORMER CONSULTANTS  
P. O. BOX #4724  
AKRON, OHIO 44310  
ATTN R O'DEA

**Staley**

A E STALEY MFG CO  
EAST POST ROAD  
MORRISVILLE PA 19067

O CE  
DUPLICATE

ATTN ACCTS PAYABLE P O BOX

QUANTITY	DESCRIPTION	OUR STOCK NO	DISC.	PRICE/UNIT
		PA SALES & USE TAX EXEMPT - PERMIT #99-19365		
1	<p>LABOR &amp; MATERIAL TO RETROFILL (4) FOUR TRANSFORMERS DURING 10/23/85 UTILITY SHUTDOWN</p> <p>FOUR UNITS US-1 T-2 T-4 &amp; T-6</p> <p>T C WILL SUPPLY THEIR OWN POWER &amp; JOB WILL TAKE NO LONGER THAN 10 HRS</p> <p>ALL WORK WILL BE DONE ON 10/23/85 BEGINNING 6 AM</p> <p>ALL TERMS &amp; CONDITIONS TO BE AS PER OUR PROPOSAL #FS-85-1525-R, DATED 8/6/85</p> <p><u>CONFIRMING ORDER - DO NOT DUPLICATE</u></p> <p>PRICE OF THIS ORDER IS EXCLUSIVE OF PA SALES &amp; USE TAX AS EQUIPMENT IS USED IN MANUFACTURING PROCESS</p>			\$ 27 419 00 LOT

*Changes to  
Acc # 9278*

5000018

TRANSFORMER CONSULTANTS  
DIVISION OF S.D. MYERS INC  
P.O. BOX 4724  
AKRON OHIO 44310  
800-221-9580/216-929-2847

*[Handwritten scribbles]*

\* RETROFILL PROPOSAL \*

*900/Thurs*

FS-85-1515-R  
REVISION 0  
DATE 8/6/85

ESPECIALLY PREPARED FOR

A E STALEY  
E FOST RD  
MORRISVILLE PA-19067  
ATTN MARI MERRILL  
TEL (215) 295-5011

In response to your request we are pleased to submit this proposal for your consideration and approval

For information or to place your order please contact RICH ODEA (t1)

*26  
26  
28  
34567*

5000019



\* COST SUMMARY-RETROFILL \*  
PROPOSAL FS-85-1525-R

A E STALEY  
MORRISVILLE FA

TC NUMBER	MFC	SERIAL NUMBER	GALLONS	FCB CONTENT	AROCLOR	FCB TEST REQUIRED	REQ D TRIPS
14	WEST	707601	281	517	1242	YES	2
16	WEST	11757	700	47	1242	YES	1
18	WEST	458801	817	748	1242	YES	1
20	WEST	458802	817	1058	1242	YES	2

SUB TOTAL TRIP NO 1 \$27419  
SUB TOTAL TRIP NO 2 \$0

TOTAL \$27419

\* NOTES \*

- 1 UNLESS SPECIFIED IN NOTES 2 OR 7 THE UNIT(S) MUST BE DEENERGIZED
- 2 FOR SECOND TRIP AND COMBINATION ORDER PRICING PLEASE CONTACT MR FICH ODEA
- 7 ESTIMATED RETRO FILL TIME FOURTEEN (14) HOURS

\* GUARANTEE AND TERMS \*

S D MYERS INC GUARANTEES THAT THE FCB CONTENT OF THE FINISHED OIL TO BE NON CONTAMINATED AS DEFINED IN 40 CFR 761 IN THE UNLIKELY EVENT THE FINISHED PRODUCT IN ANY OR ALL UNITS QUOTED DOES NOT MEET THIS SPECIFICATION S D MYERS WILL AT NO ADDITIONAL CHARGE CONDUCT SUCH WORK AS NECESSARY TO MEET THE QUOTED FINISHED SPECIFICATION

TERMS AFTER SERVICING FCB TRANSFORMER(S) NET 30 DAYS

S000020

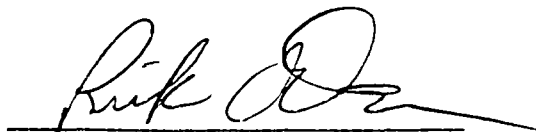
#### RETROFILL PROCEDURES AND DESCRIPTION OF SERVICES

- 1 The PCB fluid will be pumped from the transformer into DOT approved containers for proper disposal
- 2 All units greater than 500 PPM PCB will be flushed with new oil, and the flush oil will be removed and given proper disposal
- 3 It is then the practice of S D MYERS, INC to process the new oil with heat and vacuum
- 4 TRANSFORMERS HAVE NOT been quoted including additional retrofill trips to reduce the PCB to below 50 PPM

#### TERMS AND CONDITIONS

- 1 Date of Delivery Mutual Agreement
- 2 Price Quoted is valid for sixty (60) days
- 3 Terms Net 30 Days
- 4 Applicable taxes are in addition to the quoted price
- 5 Our Ohio EPA ID# is OH D044946127
- 6 S D MYERS, INC will supply enough new dielectric fluid to complete the work described
- 7 CUSTOMER will provide 60 Amp 220 or 480 Volt 3 Phase Power
- 8 S D MYERS, INC will dispose of all PCB material in compliance with current Local, State, and Federal Regulations
- 9 The laws concerning hazardous waste manifesting varies for different states and localities therefore it will be the customers responsibility to provide the proper hazardous waste manifest approved by the state in which the work is to be performed. Questions concerning this matter may be directed to MR JOHN WUNDERLE, JR Manager of Environmental Services, S D MYERS, INC, 800 321 9580 or 216 929 2847
- 10 Due to the national backlog of PCB liquid disposal, S D MYERS, INC is unable to guarantee a firm date of the materials final destruction. However, all EPA rules concerning destruction time envelopes will be satisfied
- 11 Within two (2) weeks after the receipt of CERTIFICATE(S) OF DESTRUCTION, (CD s) from the EPA approved incinerator and/or chemical waste landfill, S D MYERS, INC will forward copies of the CD s to the customer for proper legal records of the work performed
- 12 S D Myers Inc reserves the right to reject any portion or all of this proposal if upon inspection, we determine the environmental, operational, or safety procedures violate our standard practice

For more information please contact RICK ODEA (t1)



S000021

BER ICES TO BE SUPPLIED B CUSTO E

ECOLOG REGUI EME TS ET I d ly i p d it EN IR E AL L S d SAFETY  
P i l t i l f g ti p t i i g t t C t l i i th C t l g id

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S D M I l l f y d i l p

A it t t ill d l h C t ig  
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y l h y t t t

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t l i t p t i q i t l C t l t i l p t ill k t  
t i l ti l t l l T l t i l p t

g 3 ph 60 MZ q i d l t l p ill g 220 l t 15 p t B l t 75  
( di g t p i t

STO AGE A D DISPOSAL T C ill p d p t g l  
g l l q ip i f di i g t l l i th C i g f th C t  
l t i l q ip

OR S I i g t i d b ith t i t i g t b  
f h l d t f i d i t S 17 k f t i t d t y i b  
t t f i g J t

ACCESS AND AVAILABILIT It ill b f t C t p id dy  
l l t t J b i d t th i t b d Th y d y g  
t C p f l t t d t i f S D My l d b th C t t t g O  
p d d t t pti

DT ER CO D ID S  
l Th C t ll b i t l p l i g i

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f S d il i b ti d f i l d l l t b q d t ppl i t th t  
C t

3 I i l d g t t S D M I b i g t i l l i t d th k t d f i  
thi l i d C t g t Th C d S D q i l l b i l y i th k t d t i t i  
t l f l t l l i h d S D My I i i y b l g t d t i t i  
p i i pl i ti g h p ti f id l p t p i g

4 Fo l i y p ti p l d pl t f ty S D My I p t l i th l g h t y  
m y d h k g i d b i q p t l i t

5 I i i d th t ll l t i l d i h i i t i f th t  
i d th l i f f id q ip t i t i b j t t f i l N th f th  
C i d b g d t t i d m i f y d h l d h l S D M I p l y  
g t f f h t d i t t t i f y f i d d g i t y l l l i g d g  
l i t t h p J d g t d t d t of y i d d t

T p i t i i t i p p l h l l b p t f y t t l t i g f  
id p p l d t d i g l th t d i t i th th t t d h i d d i t i g t  
h th l i d i t C t i t i y y p p t i g t d i f th l b i i g S D M  
I g t i t i d t d t i g d i g d by i t l th i d p t t i g All p p l i  
g t i t i d p t t i l f y d p i t d f d h t g d h i

S000022

# Certificate of Insurance

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER.  
IT DOES NOT AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES LISTED BELOW.

M L D F S O G E C

THE CHURCH AGENCY, INC  
411 EAST MARKET STREET  
AKRON, OHIO 44304

## COMPANIES AFFORDING COVERAGES

COM A UNITED STATES FIDELITY & GUARANTY

CO B

COMP C

CO P D

COMP E

ME D DD SS O S ED

S D MYERS, INC  
TRANSFORMER CONSULTANTS  
P O BOX 3575  
AKRON, OHIO 44310

Th t rth th pl f a l ted bel wh bee ed th ed med bo d f tth tm Nw th d g y a m d ll h  
f y t t th doc m t with pect t wh h ths rtf at my be s ed my pert th a ff d d by th pl d bed n  
t m l d dt f s ch pol

C7	EQ SR CE	OLC UMRE	Q C	L t of Liability Th ds(000)
	<b>GENERAL LIABILITY</b> <input checked="" type="checkbox"/> OM F F S V E O <input checked="" type="checkbox"/> FM F - O P E T O S <input checked="" type="checkbox"/> F LOS O D COL SE <input checked="" type="checkbox"/> DE G O D J D <input checked="" type="checkbox"/> ODU S COM LE EL <input checked="" type="checkbox"/> O F O S J D <input checked="" type="checkbox"/> CO CU SU CE <input checked="" type="checkbox"/> R O D O O F <input checked="" type="checkbox"/> I G F <input checked="" type="checkbox"/> DE E E CO O S <input checked="" type="checkbox"/> O J	MP022746790	11/12/86	\$1 000 Combined Single Limit \$ \$ \$ \$ \$
	<b>AUTOMOBILE LIABILITY</b> <input checked="" type="checkbox"/> COM F E O <input checked="" type="checkbox"/> O D <input checked="" type="checkbox"/> ED <input checked="" type="checkbox"/> O O E	BAP058548810	11/12/85	\$ \$ \$ \$1 000 \$ \$ \$
	<b>EXCESS LIABILITY</b> <input type="checkbox"/> UMB E O <input type="checkbox"/> O E UMB ELL <input type="checkbox"/> O			\$ \$ \$ \$
	<b>WORKERS COMPENSATION</b> a d <b>EMPLOYERS LIABILITY</b>			\$ \$
	<b>OTHER</b>			

DESCR PTIO O OPER TONS LOC TIONS/VE CLES

VERBAL

MORRISVILLE PA

**Cancellation** Should any of the above described policies be cancelled before the expiration date thereof the issuing company will endeavor to mail 30 days written notice to the below named certificate holder but failure to mail such notice shall impose no obligation or liability of any kind upon the company

ME D ADDRESS OF CERT F C TE HOLDER

A E STALEY MFG COMPANY  
ATTN MARK MERRILL  
E POST ROAD  
MORRISVILLE PA 19067

OCTOBER 8 1985

D TE ISSUED

THOMAS E BRANDT  
VICE PRESIDENT  
5000023

# STATE OF OHIO

## THE INDUSTRIAL COMMISSION & BUREAU OF WORKERS COMPENSATION

COLUMBUS OHIO 43215

### CERTIFICATE OF PREMIUM PAYMENT

THIS IS TO CERTIFY AND NOTICE IS HEREBY GIVEN TO ALL PERSON that on date hereof the below named employee paid into the State Insurance Fund premium as provided by law and that the aforesaid employee is entitled to the rights and benefits of said fund during the period below set forth. MUST BE POSTED IN A CONSPICUOUS PLACE

RISK NO. AND EMPLOYER

PERIOD SPECIFIED BELOW

Risk 405053

C. J. GLENN Inc

2757 Front St

Cuyahoga Falls Ohio 44223

07-01-23 to 06-30-24

OMD 22

*Sam F. Marshall*  
ADMINISTRATOR

5000024

**DIVISION OF EDWARDS** **TRANSFORMER CONSULTANTS**

*Dedicated to conserving our nation's natural oil resources  
and prolonging the life of transformers nationwide*

P O Box 4724  
Akron Ohio 44310 0575  
Phone (216) 929 2847

Attention

RE P O =

Location of Work

This is to acknowledge receipt of the above captioned purchase order and to thank you for the opportunity to serve you by providing the service authorized. Please note the appropriate items checked.

☐ No documentation required as services were performed outside of your plant

☒ Insurance certificate and workmen's compensation enclosed

☐ Insurance previously on file workmen's compensation enclosed

Please contact the department indicated below should there be any questions regarding the scheduling of the work to be performed.

☐ Akron Sales

☐ IB Coatings

☐ West Coast Sales

☒ Field Services

☐ Rerefining

☐ Houston Sales

☐ Please note that this acknowledgement is issued against your verbal purchase order as indicated. Therefore should any purchase order be required before payment can be made please have one issued and same forwarded to this office so that our files may be complete.

Again we thank you for the opportunity to serve you and we trust that the above information will complete your files.

Very truly yours

*Phyllis Miner*

Accounting Dept

Removal #1 10/23/85

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		21 Generator's US EPA ID No PAD061805404	Manifest Document No 85-092		2 Page 1 of 1	Information in the shaded areas not required by Federal law	
3 Generator's Name and Mailing Address A E Staley Mfg Co E Post Road Morrisville PA 19067					A State Manifest Document Number		
4 Generator's Phone ( 215 ) 295-5011 MARK MERRILL					B State Generator's ID		
5 Transporter 1 Company Name S. D. Myers, Inc.		6 US EPA ID Number OH-D044946127	C State Transporter's ID OH-D044946127		D Transporter's Phone 216/929-2847		
7 Transporter 2 Company Name		8 US EPA ID Number	E State Transporter's ID		F Transporter's Phone		
9 Designated Facility Name and Site Address S D Myers Inc 1500 Commerce Drive Stow OH 44224		10 US EPA ID Number OH-D044946127	G State Facility's ID OH-D044946127		H Facility's Phone 216/929-2847		
11 US DOT Description (Including Proper Shipping Name Hazard Class and ID Number)			12 Containers No	Type	13 Total Quantity	14 Unit Wt/Vol	15 Waste No
a <input checked="" type="checkbox"/> Waste-Polychlorinated Biphenyl Transformer oil containing over 500 PPM PCB RQ-ORM-E UN2315			Bulk	DM	2800	G	
b <input type="checkbox"/>							
c <input type="checkbox"/>							
d <input type="checkbox"/>							
J Additional Descriptions for Materials Listed Above					K Handling Codes for Wastes Listed Above		
15 Special Handling Instructions and Additional Information							
16 <b>GENERATOR'S CERTIFICATION</b> I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations							
Printed/Typed Name A E STALEY					Signature <i>[Signature]</i>		Date Month Day Year 10 23 85
17 Transporter 1 Acknowledgement of Receipt of Materials					Signature <i>[Signature]</i>		Date Month Day Year 10 23 85
Printed/Typed Name S D MYERS INC					Signature <i>[Signature]</i>		Date Month Day Year 10 23 85
18 Transporter 2 Acknowledgement of Receipt of Materials					Signature		Date Month Day Year
Printed/Typed Name					Signature		Date Month Day Year
19 Discrepancy Indication Space							
20 Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19							
Printed/Typed Name John P Wunderle Jr.					Signature <i>[Signature]</i>		Date Month Day Year 10 23 85

0000026

ORIGINAL - RETURN TO GENERATOR

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		21 Generator's US EPA ID No <b>PAD061805404</b>		Manifest Document No <b>85-092</b>		2 Page 1 of 1		Information in the shaded areas is not required by Federal law					
3 Generator's Name and Mailing Address <b>A E Staley Mfg Co.</b> <b>E Post Road, Morrisville, PA 19067</b>						A State Manifest Document Number							
						B State Generator's ID							
4 Generator's Phone ( <b>215</b> ) <b>295-5011</b> <b>MARK MERRILL</b>						C State Transporter's ID <b>OH-D044946127</b>							
5 Transporter 1 Company Name <b>S D Myers, Inc</b>			6 US EPA ID Number <b>OH-D044946127</b>			D Transporter's Phone <b>216/929-2847</b>							
7 Transporter 2 Company Name			8 US EPA ID Number			E State Transporter's ID							
9 Designated Facility Name and Site Address <b>S D Myers, Inc</b> <b>1500 Commerce Drive</b> <b>Stow OH 44224</b>						F Transporter's Phone							
						G State Facility's ID <b>OH-D044946127</b>							
						H Facility's Phone <b>216/929-2847</b>							
11 US DOT Description (Including Proper Shipping Name Hazard Class and ID Number)						12 Containers		13 Total Quantity		14 Unit Wt/Vol		15 Waste No	
						No		Type					
a <b>Waste-Polychlorinated Biphenyl Transformer oil containing over 500 PPM PCB UN2315</b>								<b>DM</b>		<b>200</b>		<b>G</b>	
b													
c													
d													
J Additional Descriptions for Materials Listed Above						K Handling Codes for Wastes Listed Above							
15 Special Handling Instructions and Additional Information													
16 GENERATOR'S CERTIFICATION I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations													
Printed/Typed Name <b>A E STALEY</b>						Signature <b>X</b>		Date Month Day Year					
17 Transporter 1 Acknowledgement of Receipt of Materials						Printed/Typed Name <b>S. D. MYERS, INC.</b>		Signature <b>X</b>		Date Month Day Year			
18 Transporter 2 Acknowledgement of Receipt of Materials						Printed/Typed Name		Signature		Date Month Day Year			
19 Discrepancy Indication Space													
20 Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19													
Printed/Typed Name						Signature		Date Month Day Year					

S000027

GENERATOR COPY



From **A E STALEY MFG CO**  
E Post Road  
At **Morrisville PA 19067**

DEFG ATE WITH AN (X)

19 **85** BY TRUCK ☒ FREIGHT ☐ Shipper's No

Carrier \_\_\_\_\_ Agent's No \_\_\_\_\_  
(M I ad g - F p pos l i on only)

Consigned to **S D MYERS, INC**  
**1500 Commerce Drive**  
Destination **Stow, OH 44224**

State of **OHIO** County of **SUMMIT**

Route \_\_\_\_\_

Delivering Carrier \_\_\_\_\_ Vehicle or Car Initial \_\_\_\_\_ No \_\_\_\_\_

N P k ges	HM	DESCRIPTION AND CLASSIFICATION Id ifca Pop Shpp g N m Clas d 72 10 72 202 172 203	UN NA#	W g (S b C )	C R	C C m	S bje Se ion 7 i ond on d pp cabl bill fild g th pmen be de ered i on ignee with out ecou on he con ig or con ignor all ig th following amen T ca ie all no ma delery i pmen without p yme i f gh nd ll erl w h es
55 gallon drums	X	Waste-Polychlorinated Biphenyl Transformer oil containing over 500 PPM PCB RQ, ORM-E	2315	2400 gal.			P _____ (Sgna i C igno )
TANKER							Il h g t be pep d w or mp her T be Pep id
							R ed \$ _____ pply p p ymen f ges on the pop rty de bed ereon
							Ag or C he
							P _____ (T g w dg ony mo p p d )
							C g Ad d
							<b>C O D SHIPMENT</b> Prep id <input type="checkbox"/> Collect <input type="checkbox"/> \$ _____ Collection Fee _____ T al Chrg _____ If th h pment moves b twee hw p by ca byw th l w q th th bll fild g sh ll t wh th i C Shpp weight Shppe mp t k f lamp t p rt f bll fild g app ed by th De- partment f Tra sp rt t NOTE—Wh reth i depend ion lue hppers q ed t i pec l f th p rty THIS SHIPMENT IS CORRECTLY DE- SCRIBED CORRECT WEIGHT IS _____ LBS S bje ion by l R p W g g d l p B A ord g l Aq me P _____
TOTAL PIECES							If i w chrg sult th g ed d d d l fth with described co rs h eby sp ficall y t i d t be t ceed g 50 ce ts pe pou d p rt i

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P ca ion d R Sol on M g O on S m m m g  
Shipper Per \_\_\_\_\_  
Agent Per \_\_\_\_\_

P man t post-office dd ess f hpp

5000028

4

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## STRAIGHT BILL OF LADING — SHORT FORM — ORIGINAL — NOT NEGOTIABLE

From S. D. MYERS, INC.1500 Commerce Dr Stow OH 44224 19 85 BY TRUCK ☒ FREIGHT ☐ Shipper's No

Carrier \_\_\_\_\_ Agent's No \_\_\_\_\_

Consigned to ENSCO Inc American Oil RoadDestination El Dorado AK 71730 State of \_\_\_\_\_ County of \_\_\_\_\_

Route \_\_\_\_\_

Delivering Carrier \_\_\_\_\_ Vehicle or Car Initial \_\_\_\_\_ No \_\_\_\_\_

Packages	HM	DESCRIPTION AND CLASSIFICATION Id 11 Pop Shpp g N m Ci d N mb p 7 0 72 202 72 203	UN NA	W g (S C )	Cl R	C C	No
1	X	Waste polychlorinated biphenyl ORM-E UN2315 RQ liquid greater than 500ppm MANIFEST NO AR-55211 WORK ORDER #112815 PRODUCT CODE 3282-ZT PURCHASE ORDER #B30983-31-B-0 *(25) Anderson Clayton Phoenix AZ FS 85-122 10/19/85 *(18) Great Salt Lake Mineral & Chemical Ogden UT FS 85-121 10/16/85 *(13) Chrysler Corp Marysville MI FS M10620919 10/27/85 2800 gallons pumped directly into tanker A E Staley Morrisville PA FS 85-092 10/27/85 *drummed then pumped into tanker					<p>Subject Section 7 and on of pp ble bul dr g pmen be de ed on agree with out econ on he con ignor con gnor al ig th following ta eme T ter shall no ma del y pme w hou p yment of gh nd ther awl es</p> <p>P _____ (Sg (Co ignor)</p> <p>I h g be p paid wt or mp her T be p p id</p> <p>R ed \$ _____ pp p yme ges on ve p ope de bed ereon</p> <p>Ag or C ie</p> <p>P _____ (I g dg onl mo )</p> <p>C g</p> <p><b>C O D SHIPMENT</b> Prep id 3 Co ed 0 \$ _____ Collection Fee _____ T al Chang _____</p> <p>If h np tmo b twee tw p by ca by wt th l w eq th l r bli llding h l la wh th C Sh p weig</p> <p>Shippe imp l i lamp not p r t bill fl d g app ed by th De p ment IT p l</p> <p>NOTE—Wh th depend ion al h ppe q ed l l pec lly m w lth g d decl d lly fth p opey</p> <p>THIS SHIPMENT IS CORRECTLY DE SCRIBED CORRECT WEIGHT IS _____ LBS</p> <p>on by h R p W g g nd p on B A d g g me P _____</p>

TOTAL  
PIECES

S. D. Myers Inc Shipp Per  
Agent Per Shipp Per  
 Form pos-off de ad ess l h pper

S000030

1

M E M O

TO R L Dickins r  
FROM M O Merrell

SUBJECT PCB's - Transformer Retr fill - Morrisville Plant

On Wednesday October 23rd 1985 the Morrisville Plant had its annual utility shut down. During the shut down we had four (4) transformers serviced by the S D Myers Inc /Transformer Consultants company. The work performed was to have four (4) transformers retro filled with new oil which would thereby reduce the amounts of PCB's in the units so that they could be reclassified.

Two (2) of the four (4) units will be reduced from a contaminated status to a non-PCB status. The other two (2) units will be reduced from a PCB status to a contaminated status. Oil samples were taken before the retro filling process began and after it was completed for each transformer. I should be receiving the results of these samples in a week or two.

Included in the cost of the retro fill is the return of the worker to perform another retro fill on the two (2) units that are now contaminated. The second retro filling process will reduce the status of the units to a non-PCB status. The time of this second retro filling operation has not yet been determined.

Attached for your records are the following:

- 1) Quotation and terms from S D Myers Inc
- 2) Purchase order
- 3) Certificate of Insurance
- 4) Hazardous Waste Manifest
- 5) Oil shipment papers

There was a total of 4800 gallons of new oil used and 4800 gallons of PCB contaminated oil taken away.

The job went very well with the total time to retrofill the four (4) units taking approximately 8 hours. I would recommend the S D Myers/Transformer Consultants company for doing similar work in any of the other Staley facilities.

If you have any further questions feel free to contact me at any time.

M O Merrell

cc R J Obuszewski wc/att  
L Vandier wc/att  
R Miller w/att  
R Odea/Transformer Consultants

5000031

TRANSFORMER MANUFACTURING  
DIVISION OF S.D. YEAS & CO.  
P.O. BOX 714  
AKRON OHIO 44310  
200-321-9580/213 929-2347

\* RETROFILL PROPOSAL \*

FS-85-455 F  
FEVIBIC 10  
DATE 8/6/75

ESPECIALLY SELECTED FOR

A E STALEY  
E POST RD  
MORRISVILLE PA-19067  
ATTN MARK MCFRILL  
TEL (215)225-5011

In response to our request we are pleased to submit this proposal for  
your consideration and approval

For information or to place your order, please contact RICK DEEA tel

S000032

\* COST SUMMARY  
FEDERAL: 170

\* - TIT \*  
1, 2, 3

A E STALEY  
MOFRIEVILLE, PA

TC NUMBER	MFG	SERIAL NUMBER	CALLOWS	FCB CONTENT	TOTAL	FCB TEST RESULT	UNIT
14	EST	707501	281	517 15	242	S	2
8	EST	11757	700	47 12	242	S	1
8	EST	11757	817	7-8 15	1242	S	1
11	EST	400802	817	1008 15	242	YES	2

SUB TOTAL TRIP NO 1 \$27419

SUB TOTAL TRIP NO 2 \$0

TOTAL \$27419

\* NOTES \*

1. FOR SPECIFIED IN NOTES 2 OR 3, THE UNIT(S) LISTED
2. FOR SECOND TRIP AND COMBINATION ORDER PRICING BASED ON TOTAL FCB CONTENT
3. TEST PERIOD BEFORE FILL TIME FOURTEEN (14) HOURS

\* GUARANTEE AND TERMS \*

AND THE INC. GUARANTEES THAT THE FCB CONTENT OF THE FINISHED OIL TO BE  
OIL IS TRIMMED AS DEFINED IN 40 CFR 761 IN THE UNLIKELY EVENT THE FINISHED  
OIL IN ANY OR ALL UNITS QUOTED DOES NOT MEET THIS SPECIFICATION AND  
WILL AT NO ADDITIONAL CHARGE CONDUCT SUCH WORK AS NECESSARY TO MEET THE  
QUOTED FINISHED SPECIFICATION

TERMS AFTER SERVICING FCB TRANSFORMER(S) NET 30 DAYS

S000033

LL F F C F L S

100-443887-100

2 All unit, per 1000 sq ft will be 1 inch thick  
and given proper disposal

3 It is the practice of S D WYPC, INC to process oil with heat and volume

4. The above information is being furnished to you for your information only. It is not to be used for any other purpose.

1 C 116 } P 1 t

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RECD MF, AL will use of 11 PCR material in c 17 with u e t l cal, , d r al  
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I n r, d n r [ ] r [ ] c d,

10 The to the 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32 33 34 35 36 37 38 39 40 41 42 43 44 45 46 47 48 49 50 51 52 53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 100 101 102 103 104 105 106 107 108 109 110 111 112 113 114 115 116 117 118 119 120 121 122 123 124 125 126 127 128 129 130 131 132 133 134 135 136 137 138 139 140 141 142 143 144 145 146 147 148 149 150 151 152 153 154 155 156 157 158 159 160 161 162 163 164 165 166 167 168 169 170 171 172 173 174 175 176 177 178 179 180 181 182 183 184 185 186 187 188 189 190 191 192 193 194 195 196 197 198 199 200 201 202 203 204 205 206 207 208 209 210 211 212 213 214 215 216 217 218 219 220 221 222 223 224 225 226 227 228 229 230 231 232 233 234 235 236 237 238 239 240 241 242 243 244 245 246 247 248 249 250 251 252 253 254 255 256 257 258 259 260 261 262 263 264 265 266 267 268 269 270 271 272 273 274 275 276 277 278 279 280 281 282 283 284 285 286 287 288 289 290 291 292 293 294 295 296 297 298 299 300 301 302 303 304 305 306 307 308 309 310 311 312 313 314 315 316 317 318 319 320 321 322 323 324 325 326 327 328 329 330 331 332 333 334 335 336 337 338 339 340 341 342 343 344 345 346 347 348 349 350 351 352 353 354 355 356 357 358 359 360 361 362 363 364 365 366 367 368 369 370 371 372 373 374 375 376 377 378 379 380 381 382 383 384 385 386 387 388 389 390 391 392 393 394 395 396 397 398 399 400 401 402 403 404 405 406 407 408 409 410 411 412 413 414 415 416 417 418 419 420 421 422 423 424 425 426 427 428 429 430 431 432 433 434 435 436 437 438 439 440 441 442 443 444 445 446 447 448 449 450 451 452 453 454 455 456 457 458 459 460 461 462 463 464 465 466 467 468 469 470 471 472 473 474 475 476 477 478 479 480 481 482 483 484 485 486 487 488 489 490 491 492 493 494 495 496 497 498 499 500 501 502 503 504 505 506 507 508 509 510 511 512 513 514 515 516 517 518 519 520 521 522 523 524 525 526 527 528 529 530 531 532 533 534 535 536 537 538 539 540 541 542 543 544 545 546 547 548 549 550 551 552 553 554 555 556 557 558 559 560 561 562 563 564 565 566 567 568 569 570 571 572 573 574 575 576 577 578 579 580 581 582 583 584 585 586 587 588 589 590 591 592 593 594 595 596 597 598 599 600 601 602 603 604 605 606 607 608 609 610 611 612 613 614 615 616 617 618 619 620 621 622 623 624 625 626 627 628 629 630 631 632 633 634 635 636 637 638 639 640 641 642 643 644 645 646 647 648 649 650 651 652 653 654 655 656 657 658 659 660 661 662 663 664 665 666 667 668 669 670 671 672 673 674 675 676 677 678 679 680 681 682 683 684 685 686 687 688 689 690 691 692 693 694 695 696 697 698 699 700 701 702 703 704 705 706 707 708 709 710 711 712 713 714 715 716 717 718 719 720 721 722 723 724 725 726 727 728 729 730 731 732 733 734 735 736 737 738 739 740 741 742 743 744 745 746 747 748 749 750 751 752 753 754 755 756 757 758 759 760 761 762 763 764 765 766 767 768 769 770 771 772 773 774 775 776 777 778 779 780 781 782 783 784 785 786 787 788 789 790 791 792 793 794 795 796 797 798 799 800 801 802 803 804 805 806 807 808 809 810 811 812 813 814 815 816 817 818 819 820 821 822 823 824 825 826 827 828 829 830 831 832 833 834 835 836 837 838 839 840 841 842 843 844 845 846 847 848 849 850 851 852 853 854 855 856 857 858 859 860 861 862 863 864 865 866 867 868 869 870 871 872 873 874 875 876 877 878 879 880 881 882 883 884 885 886 887 888 889 890 891 892 893 894 895 896 897 898 899 900 901 902 903 904 905 906 907 908 909 910 911 912 913 914 915 916 917 918 919 920 921 922 923 924 925 926 927 928 929 930 931 932 933 934 935 936 937 938 939 940 941 942 943 944 945 946 947 948 949 950 951 952 953 954 955 956 957 958 959 960 961 962 963 964 965 966 967 968 969 970 971 972 973 974 975 976 977 978 979 980 981 982 983 984 985 986 987 988 989 990 991 992 993 994 995 996 997 998 999 1000 1001 1002 1003 1004 1005 1006 1007 1008 1009 1010 1011 1012 1013 1014 1015 1016 1017 1018 1019 1020 1021 1022 1023 1024 1025 1026 1027 1028 1029 1030 1031 1032 1033 1034 1035 1036 1037 1038 1039 1040

11 Within two (2) weeks after the receipt of CERTIFICATE(S) OF DESTRUCTION, (CDS) from the EPA approved incinerator for and/or chemical waste landfill, S B MYERS, INC. will forward copies of the CDS to the customer for proper legal records of the work performed.

12. C. B. Myers Inc. reserves the right to reject any portion or all of this proposal if, upon inspection, we determine the environmental, electrical, or safety aspects violate our standards or code.

F E R D I N A N D E R L E T P L H (1)

L. K. E.

S000034







S000037

S000038

# STATE OF OHIO

## THE INDUSTRIAL COMMISSION & BUREAU OF WORKERS COMPENSATION

COLUMBUS OHIO 432

### CERTIFICATE OF PREMIUM PAYMENT

THIS IS TO CERTIFY AND NOTICE IS HEREBY GIVEN TO ALL PERSON that on date hereof the below named employer paid into the State Insurance Fund premium as provided by law and that the employer is entitled to the rights and benefits of said fund during the period below set forth MUST BE FOLLOTTED IN A CONSPICUOUS PLACE

RISK NO. AND EMPLOYER

PERIOD SPECIFIED BELOW

Risk 405551

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ADMINISTRATOR

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		21 Generator's US EPA ID No <b>PAD061805404</b>		Manifest Document No <b>85-092</b>		2 Page 1 of 1 Information in the shaded areas is not required by Federal law	
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						B State Generator's ID	
4 Generator's Phone ( <b>215</b> ) <b>295-5011</b> <b>MARK MERRILL</b>				6 US EPA ID Number <b>OH-D044946127</b>		C State Transporter's ID <b>OH-D044946127</b>	
5 Transporter 1 Company Name <b>S D Myers, Inc</b>				8 US EPA ID Number		D Transporter's Phone <b>216/929-2847</b>	
7 Transporter 2 Company Name				10 US EPA ID Number		E State Transporter's ID	
9 Designated Facility Name and Site Address <b>S D Myers, Inc</b> <b>1500 Commerce Drive,</b> <b>Stow, OH 44224</b>				10 US EPA ID Number <b>OH-D044946127</b>		F Transporter's Phone	
						G State Facility's ID <b>OH-D044946127</b>	
						H Facility's Phone <b>216/929-2847</b>	
11 US DOT Description (Including Proper Shipping Name Hazard Class and ID Number)						12 Containers	
						No	Type
a <b>Waste-Polychlorinated Biphenyl Transformer oil containing over 500 PPM PCB RQ-OEM-E, UN2315</b>							<b>DM</b>
b							
c							
d							
J Additional Descriptions for Materials Listed Above						K Handling Codes for Wastes Listed Above	
15 Special Handling Instructions and Additional Information							
16 GENERATOR'S CERTIFICATION I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified packed marked and labeled and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations							
Printed/Typed Name <b>A E STALEY</b>						Signature <b>X</b>	
						Date Month Day Year	
17 Transporter 1 Acknowledgement of Receipt of Materials						Date	
Printed/Typed Name <b>S D MYERS, INC</b>						Signature <b>X</b>	
						Date Month Day Year	
18 Transporter 2 Acknowledgement of Receipt of Materials						Date	
Printed/Typed Name						Signature	
						Date Month Day Year	
19 Discrepancy Indication Space							
20 Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19							
Printed/Typed Name						Signature	
						Date Month Day Year	

S000039

GENERATOR COPY

to the classifications and terms in effect on the date of the issue of this Bill of Lading. The property described below in apparent good order except as noted (content and condition packages unknown) marked consigned and destined as indicated below which said carrier being understood throughout this contract as meaning any person or corporation of the property under the contract agrees to carry to its usual place of delivery at said place on its route otherwise to deliver to another carrier on the route to said destination. It is agreed as to each carrier of all or any of said property over all or any portion of said route to destination and a bill of lading at any time interested in all or any said property that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.

Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

From A. E. STALEY MFG CO.  
E Post Road  
At Morrisville, PA 19067 1985 BY TRUCK ☒ FREIGHT ☐ Shipper's No \_\_\_\_\_  
Carrier \_\_\_\_\_ Agent's No \_\_\_\_\_  
(Mail or teletype address of consignee—For purposes of notification only)  
Consigned to S. D. MYERS, INC.  
1500 Commerce Drive  
Destination Stow, OH 44224 State of OHIO County of SUMMIT  
Route \_\_\_\_\_

Delivering Carrier		Vehicle or Car Initial				No	
No Packages	HM	DESCRIPTION AND CLASSIFICATION Proper Shipping Name, Class and Identification Number per 172.101-172.202 172.203	UN# or NA#	Weight (Sub to Car)	Class or Rate	Check Column	Subject to Section 7 of conditions of applicable bill of lading if this shipment is to be delivered to the consignee without recourse on the consignor the consignor shall sign the following statement: The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.
55 gallon drums	X	Waste-Polychlorinated Biphenyl. Transformer oil containing over 500 PPM PCB. RQ, ORM-E	2315	2400 gal.			Per _____ (Signature of Consignor) If charges are to be prepaid write or stamp here "To be Prepaid"
TANKER							Received \$ _____ to apply in prepayment of the charges on the property described hereon Agent or Cashier Per _____ (The signature here acknowledges only the amount prepaid) Charges Advanced
							<b>C O D SHIPMENT</b> Prepaid <input type="checkbox"/> Collect <input type="checkbox"/> \$ _____ Collection Fee _____ Total Charges _____ If the shipment moves between two ports by a carrier by water the law requires that the bill of lading shall state whether it is "Carrier's or Shipper's weight." Shipper's Impert in lieu of stamp not a part of bill of lading approved by the Department of Transportation. NOTE — Where the rate is dependent on value shippers are required to state specifically in writing the agreed or declared value of the property. THIS SHIPMENT IS CORRECTLY DESCRIBED CORRECT WEIGHT IS _____ LBS Subject to verification by the Respective Weighing and Inspection Bureau According to Agreement Per _____
TOTAL PIECES							

The above containers used for this shipment conform to the specification set forth in the code marked on hereon and other equipment of R 15 of the Uniform Freight Classification and Rule 5 of the National Motor Freight Classification. Shipper's Impert in lieu of stamp not a part of bill of lading as provided in the late Commerce Commission.

Shipper Per \_\_\_\_\_  
Agent Per \_\_\_\_\_  
Permanent post-office address of shipper: \_\_\_\_\_

5000040 4

This is to certify that the above-named materials are properly classified described packaged marked and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation.

M E M O

TO R L Dickinson  
FROM M O Merrell

SUBJECT PCB's - Transformer Retrofill - Morrisville Plant

On Wednesday, October 23rd, 1985, the Morrisville Plant had its annual utility shut down. During the shut down we had four (4) transformers serviced by the S D Myers, Inc /Transformer Consultants company. The work performed was to have four (4) transformers retrofilled with new oil which would then reduce the amounts of PCB's in the units so that they could be reclassified.

Two (2) of the four (4) units will be reduced from a contaminated status to a non-PCB status. The other two (2) units will be reduced from a PCB status to a contaminated status. Oil samples were taken before the retrofilling process began and after it was completed for each transformer. I should be receiving the results of these samples in a week or two.

Included in the cost of the retrofill is the return of the workmen to perform another retrofill on the two (2) units that are now contaminated. The second retrofilling process will reduce the status of the units to a non-PCB status. The time of this second retrofilling operation has not yet been determined.

Attached for your records are the following:

- 1) Quotation and terms from S D Myers Inc
- 2) Purchase order
- 3) Certificate of Insurance
- 4) Hazardous Waste Manifest
- 5) Oil shipment papers

There was a total of 2800 gallons of new oil used and 2800 gallons of PCB contaminated oil taken away.

The job went very well with the total time to retrofill the four (4) units taking approx 8 hours. I would recommend the S D Myers/Transformer Consultants company for doing similar work in any of the other Staley facilities.

If you have any further questions feel free to contact me at any time.

M O Merrell

cc K J Obuszewski wo/att  
L VanDoren wo/att  
R Miller w/att  
R Odea/Transformer Consultants

5000041

# AUTHORIZATION FOR EXPENDITURE

CLASS

Number 9278

Date Sept 6 1985

TITLE

PCB Transformer Retrofill Program

AMOUNT AUTHORIZED

\$ 28 790 00

PERSON(S) AUTHORIZED TO APPROVE PURCHASES

M O Merrell

ECONOMIC JUSTIFICATION  
TO BE PREPARED

☐ YES ☐ NO

## Description — Purpose — Anticipated Results of Expenditure

This AFE is being submitted to request funding for changing out the PCB contaminated oil in four (4) of our transformers At present we have four (4) units, two (2) of which are considered PCB contaminated and two (2) of which are considered PCB units

This retrofill procedure which will be done during our next scheduled utility shutdown will reduce all PCB levels in the four transformers so the units will be classified as Non-PCB transformers

Cash Flow 1st Qtr Fiscal Year 1986

Classification Environmental

Expensed \$28 790 00

Total \$28 790 00

**MORRISVILLE**

**ENVIRONMENTAL**

Not To be used for other than the purpose of this page

## ESTIMATED COST

Acquisition \$ \_\_\_\_\_

Improvement New Construction and Equipment \$ \_\_\_\_\_

Repairs Maintenance and Relocation \$ 28,790.00

Special Professional Services \$ \_\_\_\_\_

Total Amount Authorized \$ 28,790.00

Additional Working Capital \$ \_\_\_\_\_

Total Direct Investment \$ \_\_\_\_\_

## RETURN ON INVESTMENT

Total Direct Investment \$ \_\_\_\_\_

Allocated Facilities \$ \_\_\_\_\_

Total Investment \$ \_\_\_\_\_

Less Sale of Replaced Equip Investment Credit & Tax on Expensed Portion \$ \_\_\_\_\_

Total Net Direct Investment \$ \_\_\_\_\_

Annual Increased Income (After Income Taxes) \$ \_\_\_\_\_

Less / Return Required On Allocated Facilities \$ \_\_\_\_\_

Return on Net Direct Investment \$ \_\_\_\_\_

REQUESTED BY

M A T 12/1/85

DATE

APPROVED BY DIVISION HEAD

DATE

APPROVED & APPROVED BY

DATE

APPROVED BY VICE PRESIDENT

DATE

APPROVED BY CONTROL DIVISION

DATE

APPROVED BY PRESIDENT OR CHIEF EXECUTIVE OFFICER

DATE

UT VICE COMMITTEE MEMBERS DATED

SE P AFE

DATE

## WORK ORDER ASSIGNMENTS

[illegible]

Accounting Opinion by

A Livingston M

BUILDING AND MAJOR EQUIPMENT TO BE REMOVED ON THIS AFE

[illegible]



TO K J OBUSZEWSKI  
FROM M O MERRELL

DATE 9/6/85

SUBJECT PCB TRANSFORMER RETROFILL PROGRAM - AFE JUSTIFICATION

#### SUMMARY

We presently have four (4) transformers which are filled with silicon oil which have a part per million (ppm) reading of PCB materials in excess of the governmental limits which put them in a category of either a PCB Contaminated transformer or a PCB' transformer. The retrofilling process we propose will reduce the amounts of PCB's in the oil to where the transformers will be able to be reclassified as Non-PCB transformers.

#### DISCUSSION

At present our four (4) transformers which have PCB's in the silicon oil have the following readings

<u>UNIT #</u>	<u>PCB CONTENT -- PPM</u>	<u>GALLONS PER UNIT</u>
US-1	517	281
T-2	47	700
T-4	348	817
T-6	1058	817

Transformer Consultants have provided us with a quote to reduce the PCB's in all four (4) units to levels which will reclassify the units as Non-PCB transformers. Units US-1 and T-6 will require two (2) retrofilling operations to reduce the PCB content below 45 PPM. All six (6) retrofills, four (4) during the next utility shut-down and two (2) during the following utility shut-down, are included in the quoted price of \$27,419.00.

Transformer Consultants will provide us with full documentation regarding the shipping, handling and disposal of the contaminated oils. Everything will be done in accordance with all government regulations.

The initial retrofilling operation will be done during our utility shut-down in October or November 1985. The second retrofill operation cannot be done any sooner than six (6) months after the first retrofill. Therefore the second retrofill will probably be done in October or November 1986.

#### RECOMMENDATION

Attached is an AFE for an amount of \$28,790.00 to cover the cost of the retrofilling operations plus a 5% contingency to cover the cost of any additional labor or materials. I recommend this AFE be approved as soon as possible so work can be done during the Fall 1985 shut-down.

M O Merrell

S000044

COST\_ESTIMATE

TITLE PCB\_Transformer\_Retrofill\_Program

DATE 9/6/85

CODE	DESCRIPTION	MATERIAL_COST	LABOR_COST	TOTAL_COST
EXP	Retrofilling		\$27,419	\$27,419
	Contingency @ 5%		1,371	1,371
		=====	=====	=====
	Total Request		\$28,790	\$28,790

S000045

R L DICKINSON

Acts 4 12

**DIVISION OF  
ED Myers**

**TRANSFORMER  
CONSULTANTS**

P O Box 4724  
Akron Ohio 44310  
Phone (216) 929-2847  
Toll Free (800) 321 9580

November 5, 1985

A E Staley  
East Post Rd  
Morrisville, PA 19067

Attention Mark Merrell

RE Retrofill of 10-23-85

Dear Mark

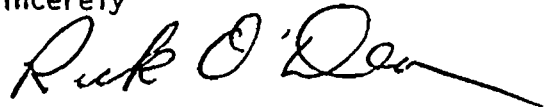
I was pleased that our men performed the work to your satisfaction. They generally do an outstanding job, but rarely get the credit they deserve. We appreciate your letter and endorsement of our services.

The PCB contaminated liquid is awaiting processing for final incineration. I would like to confirm that there are no E P A regulations etc that require notification of the state, local, or federal authorities by either ourselves or A E Staley in conjunction with the retrofill work. All required paperwork is handled by S D Myers Inc with the exception of the manifest for transport of the liquid from your facility to ours.

You will be receiving a copy of the "certificate of destruction" for your records. This, along with your copy of the manifest, will be the only paperwork you must keep on file as proof of what became of the liquid.

I trust this information is helpful. Please contact me if I can be of further assistance.

Sincerely



Rick O'Dea  
Regional Sales Representative

RO/lam

*PLEASE CALL ME ON THIS  
WE FIND IT HARD TO BELIEVE WE DON'T  
HAVE TO NOTIFY SOMEONE IN THE STATE OF PA*

*Mark Merrell*

*MORRISVILLE EXT 263*

S000046

Morrisville Retrol 11 10 lbs / rs

Mark Merrill TC Transformer Consultants

4	Retrol 11ed Units	1000 ppm (Retrol 11 ex)
		<del>500 ppm</del>
		<del>300 ppm</del>
		49 ppm

GE Estimated that to Replace  
9 200KVA and 1 3333 KVA  
PCC Transformers = 636,000 (Or 1/1/11)  
668,000 5:1 Cont.

501866-7173

1985

RECEIVED

NOV 26 '86

RECEIVED  **ensco**

a division of environmental systems company

NOV 14 1985

TRANSFORMER CONSULTANTS DIV  
S D MYERS INC

American Oil Road  
P O Box 1957  
El Dorado Arkansas 71731

DATE 11/1/85

Enclosed you will find the Generator's Original Copy of  
Arkansas Manifest No (s) AR- 55211  
for your company's shipment of materials to ENSCO, INC  
El Dorado, Arkansas which arrived on site 11-08-85

*William M Driskell*

William M Driskell  
Transportation Manager

WHD as

Enclosure

5000048

Please print or type (Form designed for use on elite (12 pitch) typewriter)

Form Approved OMB No. 2000 0404 Expires 7 31 86

UNIFORM HAZARDOUS WASTE MANIFEST		1 Generator's US EPA ID No	Manifest Document No	2 Page 1 of	Information in the shaded areas is not required by Federal law	
3 Generator's Name and Mailing Address <b>S. D. MYERS, INC</b> <b>P O BOX 4724</b>		4 Generator's Phone ( )		A State Manifest Document Number <b>AR- 55211</b>		
5 Transporter 1 Company Name <b>ENSCO</b>		6 US EPA ID Number <b>1</b>		B State Generator's ID <b>00000101177</b>		
7 Transporter 2 Company Name		8 US EPA ID Number		C State Transporter's ID <b>110PC75</b>		
9 Designated Facility Name and Site Address <b>ENSCO, Inc.</b> <b>America Oil Road</b> <b>El Dorado, AR 71730</b>		10 US EPA ID Number		D Transporter's Phone <b>503-63-175</b>		
11 US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number) <b>Waste polychlorinated biphenyl ORM-F, UN2515, liquid greater than 500 ppm</b>		12 Container's No		13 Total Quantity		14 U.S. Unit/Volume
						15 Waste ID Number
J Additional Descriptions for Materials Listed Above		K Handling Codes for Wastes Listed Above <b>Inc</b>				
15 Special Handling Instructions and Additional Information <b>WORK ORDER #112615</b> <b>PRODUCT CODE #3-E2-LT</b> <b>PURCHASE ORDER #E30963-31-L-0</b>						
16 GENERATOR'S CERTIFICATION I hereby declare that the contents of this container are fully and accurately described above by proper shipping name and are classified, packed, marked and labeled and are in all respects in proper condition for transport by highway according to applicable federal, state and local regulations and Arkansas state regulations. Printed/Typed Name: <b>GEORGE J. JONES</b> Signature: <b>[Signature]</b> Date: <b>11/7</b>						
17 Transporter 1 Acknowledgement of Receipt of Materials Printed/Typed Name: <b>George J. Jones</b> Signature: <b>[Signature]</b> Date: <b>11/7</b>						
18 Transporter 2 Acknowledgement of Receipt of Materials Printed/Typed Name: <b>[Signature]</b> Signature: <b>[Signature]</b> Date: <b>11/7</b>						
19 Discrepancy Indication Space <b>destruction will follow</b>						
20 Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19 Printed/Typed Name: <b>[Signature]</b> Signature: <b>S0000049</b> Date: <b>11/7</b>						

# RIGHT BILL OF LADING - SHORT FORM - ORIGINAL - NOT NEGOTIABLE

subject to the classifications and tariffs in effect on the date of the issue of this Bill of Lading. The property described below in apparent good order except as noted (contents and condition of packages unknown) packed, consigned, and delivered as indicated below which said word carrier (being understood throughout this contract as meaning any person or corporation in possession of the property under the contract) agrees to carry to its usual place of delivery at said destination, if on its route otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said property over all or any portion of said route to

destination and as to act partly at any time interested in all or any said property that every service to be performed hereunder shall be subject to all the bill of lading terms and conditions in the governing classification on the date of shipment.

Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and his assigns.

From S. D. MYERS, INC.

1500 Commerce Dr Stow OH 44224 19 85

DESIGNATE WITH AN (X)

BY TRUCK ☒ FREIGHT ☐ Shipper's No. \_\_\_\_\_

Carrier \_\_\_\_\_

Agent's No. \_\_\_\_\_

(Mail or street address of consignee - For purposes of notification only.)

Consigned to ENSCO, Inc American Oil Road

Destination El Dorado, AK 71730

State of \_\_\_\_\_ County of \_\_\_\_\_

Route \_\_\_\_\_

Delivering Carrier \_\_\_\_\_

Vehicle or Car Initial \_\_\_\_\_

No. \_\_\_\_\_

No. Packages	HM	DESCRIPTION AND CLASSIFICATION Proper Shipping Name, Class and Identification Number per 172.101 172.202 172.203	UN# or NA#	*Weight (Sub to Car)	Class or Rate	Check Column	Subject to Section 7 of conditions of applicable bill of lading if the shipment is to be delivered to the consignee without recourse on the consignor the consignor shall sign the following statement. The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.
1	X	Waste polychlorinated biphenyl					Per _____ (Signature of Consignor.)
		ORM-E, UN2315, RQ liquid greater					If charges are to be prepaid write or stamp here, "To be Prepaid"
		than 500ppm MANIFEST NO AR-55211					
		WORK ORDER #112815					
		PRODUCT CODE 3282-ZT					
		PURCHASE ORDER #B30983-31-B-O					Received \$ _____ to apply in prepayment of the charges on the property described herein.
							Agent or Cashier
							Per _____ (The signature here acknowledges only the amount prepaid.)
		* (25) Anderson Clayton, Phoenix, AZ FS 85-122 10/19/85					Charges Advanced
		* (18) Great Salt Lake Mineral & Chemical, Ogden UT FS					
		85-121 10/16/85					
		* (13) Chrysler Corp, Marysville, MI FS MI0620919					
		10/27/85					
		2800 gallons pumped directly into tanker A E Staley,					
		Morrisville, PA FS 85-092 10/27/85					
		*drummed, then pumped into tank					

TOTAL  
PIECES

\*The above containers used for this shipment conform to the specifications set forth in the Tariff under a certificate of origin and all other requirements of Rule 41 of the Uniform Freight Classification and Rule 8 of the National Motor Freight Classification. \*Shipper's weight in lieu of stamp not allowed. \*Shipper's weight in lieu of stamp not allowed. \*Shipper's weight in lieu of stamp not allowed.

S. D. Myers Inc El Dorado, AK 1985  
El Dorado, AK 1985  
Permanent post-office address of shipper

Agent, Per \_\_\_\_\_

Shipper Per \_\_\_\_\_

**IN PROCESS FOR DISPOSAL**

**COD SHIPMENT**  
Prepaid ☐  
Collect ☐ \$ \_\_\_\_\_  
Collection Fee \_\_\_\_\_  
Total Charges \_\_\_\_\_

"If the shipment moves between two ports by a carrier by water the law requires that the bill of lading shall state whether it is "Carrier's or Shipper's weight."

Shipper's imprint in lieu of stamp, not a part of bill of lading approved by the Department of Transportation.

NOTE - Where the rate is dependent on value, shippers are required to state specifically in writing the agreed or declared value of the property.

THIS SHIPMENT IS CORRECTLY DESCRIBED. CORRECT WEIGHT IS \_\_\_\_\_ LBS.

Inspected and approved by the Respective Weighing and Inspection Bureau According to Agreement

Per \_\_\_\_\_

If lower charges result, the agreed or declared value of the within described contents is hereby specifically stated to be not exceeding .50 cents per pound per article.

This is to certify that the above-named material is properly classified, described, packaged, marked and labeled and are in proper condition for transportation according to the applicable regulations of the Department of Transportation.

5000050

1

O.P.D.	CONF	CLASS	ORIG	C. CMT	DETAIL	JOB NO	PC	UNIT	AK	PC	REQ NO	NOTIFY	REQUISITIONER	2126
					270	94070			1				MERRILL	
DATE		APPLICABLE SALES & USE TAX		AFS NO	TERMS			BUYER					P.O. NO.	
3/12/86		EXEMPT		9407	NET 30			SOTTILE					156-MB336	
SHIPPING		VA		F.O.B.				BY		DELIVER TO				
3/24/86		BEST WAY		SHIP POINT						MORRISVILLE				

TRANSFORMER CONSULTANTS  
P. O. BOX #4724  
AKRON, OHIO

44310

ATTN: R O'DEA

A E STALEY MFG CO  
EAST POST ROAD  
MORRISVILLE PA 19067

INVOICE IN  
DUPLICATE

ATTN ACCTS PAYABLE P O BOX



- 1 LABOR & MATERIALS TO RETROFILL TRANSFORMERS US-1 & T-6 THESE ARE "TRANSFORMER CONSULTANTS" #TC-14 & TC-20. RETROFILL WILL REDUCE THE PCB LEVELS TO BELOW 45 PPM. THIS WILL RECLASSIFY THE UNITS AS "NON-PCB" TRANSFORMERS
- ANY ADDITIONAL TRIPS REQUIRED WILL BE AT NO COST TO STALEY
- \*CONTRACTOR WILL PROVIDE OWN POWER\*
- TENTATIVE DATE: 3/24/86.
- ANY ADDITIONAL COSTS FOR DISPOSAL OR NEED FOR NEW OIL WILL BE CONTRACTOR'S RESPONSIBILITY

CONFIRMING ORDER - DO NOT DUPLICATE

PRICE OF THIS ORDER IS EXCLUSIVE OF PA. SALES & USE TAX AS EQUIPMENT IS USED IN MANUFACTURING PROCESS.

(PCB - CONTAMINATED RETROFILL)

SHOW STALEY P O NO CLE OF PACKAGE  
INVOICE PACKING LIST AND

PA SALES & USE TAX EXEMPT -  
PERMIT #99-19165

\$ 14,199.00 LOT

S000051

COPY



TRANSFORMER CONSULTANTS  
DIVISION OF S.D. MYERS INC.  
P.O. BOX 4724  
AKRON, OHIO 44310  
800-321-9580/216-929-2847

**\* RETROFILL QUOTATION \***

FS-86-1149-RET  
REVISION 0  
DATE 2/21/86

ESPECIALLY PREPARED FOR

---

A E STALEY MFG CO  
E POST ROAD  
MORRISVILLE PA-19067  
ATTN MARI MERRILL  
TEL (215)295-5011

We are pleased to submit this RETROFILL quotation for your consideration and approval May we serve you?

For information or to place your order please contact RICK O DEA

S000052

**\* COST SUMMARY--RETROFILL \*  
QUOTE NO. : FS-86-1149-RET**

PAGE 1

A E STALEY MFG CO  
MORRISVILLE PA

TC NUMBER	MFG	SERIAL NUMBER	GALLONS	PCB CONTENT	PCB TEST REQUIRED	REQ D TRIPS
14	WEST	307601	281	46	NO	1
20	WEST	458802	817	122	NO	1

TOTAL COST  
3/3/86 R O Deo

*\$17699.00 - if you provide power  
\$500.00 rental of generator by S D Myers  
\$14,199.00 Total*  
\* NOTES \*

1 UNLESS SPECIFIED IN NOTES 2 OR 3 THE UNIT(S) MUST BE DEENERGIZED

**\* GUARANTEE AND TERMS \***

S D MYERS INC GUARANTEES THAT THE PCB CONTENT OF THE FINISHED OIL TO BE NON CONTAMINATED AS DEFINED IN 40 CFR 761 IN THE UNLIKELY EVENT THE FINISHED PRODUCT IN ANY OR ALL UNITS QUOTED DOES NOT MEET THIS SPECIFICATION S D MYERS WILL AT NO ADDITIONAL CHARGE CONDUCT SUCH WORK AS NECESSARY TO MEET THE QUOTED FINISHED SPECIFICATION

IN THE EVENT WE DO NOT HAVE CURRENT PCB TEST DATA UPON RECEIPT OF YOUR ORDER A TEST WILL BE CONDUCTED AT NO ADDITIONAL CHARGE IN THE EVENT THE TEST DATA CONFLICTS WITH THE DATA SHOWN, S D MYERS, INC RESERVES THE RIGHT TO REJECT ANY OR ALL PORTIONS OF THE WORK QUOTED HEREIN

TERMS AFTER SERVICING PCB TRANSFORMER(S) NET 30 DAYS

S000053

A E STALEY MFG CO  
MORRISVILLE, PA  
QUOTE # FS 85 1149-R  
REVISION 0  
DATE 2/21/86

#### RETROFILL PROCEDURES AND DESCRIPTION OF SERVICES

- 1 The PCB fluid will be pumped from the transformer into DOT approved containers for proper disposal
- 2 All units greater than 500 PPM PCB will be flushed with new oil, and the flush oil will be removed and given proper disposal
- 3 It is then the practice of S D MYERS, INC to process the new oil with heat and vacuum
- 4 TRANSFORMERS HAVE NOT been quoted including additional retrofill trips to reduce the PCB to below 50 PPM

#### TERMS AND CONDITIONS

- 1 Date of Delivery Mutual Agreement
- 2 Price Quoted is valid for sixty (60) days
- 3 Terms Net 30 Days
- 4 Applicable taxes are in addition to the quoted price
- 5 Our Ohio EPA ID# is OH-D044946127
- 6 S D MYERS, INC will supply enough new dielectric fluid to complete the work described
- ~~7 CUSTOMER will provide 60 Amp 220 or 480 Volt 3 Phase Power~~ - see generator rental
- 8 S D MYERS, INC will dispose of all PCB material in compliance with current Local, State, and Federal Regulations
- 9 The laws concerning hazardous waste manifesting varies for different states and localities; therefore, it will be the customers responsibility to provide the proper hazardous waste manifest approved by the state in which the work is to be performed Questions concerning this matter may be directed to MR JOHN MUNDERLE, JR -Manager of Environmental Services, S D MYERS, INC , 800-321-9580 or 216-929-2847
- 10 Due to the national backlog of PCB liquid disposal, S D MYERS, INC is unable to guarantee a firm date of the materials final destruction However, all EPA rules concerning destruction time envelopes will be satisfied
- 11 Within two (2) weeks after the receipt of CERTIFICATE(S) OF DESTRUCTION, (CD's) from the EPA approved incinerator and/or chemical destruction process, S D MYERS, INC will forward copies of the C D s to the customer as proof and record of the work performed
- 12 S D Myers Inc reserves the right to reject any portion or all of this proposal if upon inspection, we determine the environmental, operational, or safety procedures violate our standard practice

S000054

A E STALEY MFG CO  
MORRISVILLE PA  
DATE 2/21/84  
QUOTE # PS-88-1149-R  
REVISION 0

#### SERVICES TO BE SUPPLIED BY CUSTOMER

**ECOLOGY and SAFETY** In order to comply in a prudent manner with ENVIRONMENTAL LAWS and SAFETY REQUIREMENTS while on the Customer's property S D Myers Inc. agrees the Customer to provide our personnel with a liaison person whom the Customer considers competent in the knowledge of environmental and safety regulations pertaining to the Customer's plant.

It will be the responsibility of the liaison person to accompany and instruct the personnel of S D Myers Inc. in observing plant safety and environmental regulations to inspect all devices or equipment upon which our personnel have worked and assure that all valves are properly and securely closed that the valves are securely plugged or capped and said electrical device is free of all leak of any kind which could be the result of the work performed by S D Myers Inc.

A written statement will be provided for the Customer's signature certifying that upon the completion of the work the work is closed satisfactorily S D Myers Inc. and forever releasing S D Myers Inc. their employees agents and office from all responsibility for any leak which may occur thereafter.

**ELECTRICAL POWER** Unless otherwise specified this proposal requires the Customer to supply the electrical power to operate our equipment. The Customer's electrical department will make the electrical connections to the plant electrical system. These arrangements must be made beforehand if the Customer is unable to provide this power an additional charge will be made for a tail of a generator set. The required electrical power will range from 220 volt 15 amp to 480 volt 75 amp 3 phase 60 HZ (Depending on the type of equipment used).

**STORAGE AND DISPOSAL** The Customer will provide proper storage of supplies and materials shipped to the site of the operation. It may be necessary for the Customer to provide a safe legal container or site for disposing of material used in the servicing of the Customer's electrical equipment.

**WORK HOURS** In order for some of our servicing procedures to be most effective it may be necessary for our personnel to work anytime of the day without resting the number of hours. Normal work days are 15 to 17 hours. If this does not meet with your company policy we should be notified prior to starting work so adjustments can be made.

**ACCESS AND AVAILABILITY** It will be necessary for the Customer to provide ready access at all times to the job site and to the equipment to be serviced. The cost of any delays arising from the Customer's failure to provide such access will be paid by the Customer at the rate of \$80.00 per hour upon demand and at the option of S D Myers Inc.

#### OTHER CONDITIONS

1 The Customer shall be responsible for any loss or expense resulting from incorrect information or data furnished by it.

2 S D Myers Inc. assumes no liability for delays caused by strikes riots floods fires act of God or any cause beyond our control and shall not be required to supply services to the Customer while interruption of service due to any such cause shall continue.

3 It is acknowledged that S D Myers Inc. obligation is limited to the work contracted for in this sales order / agreement. The Customer's equipment will be solely in the care custody and control of the Customer at all times and S D Myers Inc. is in no way obligated to maintain repair service replace or assure the operation of said equipment unless special agreement for such work is made in writing.

4 For reasons of personal and plant safety S D Myers Inc. personnel reserve the right to decline any portion of the work on an emergency basis on equipment in circumstances which they may deem hazardous.

5 It is recognized that all electrical devices do not have indefinite life and that at any period in the life of said equipment it is subject to failure. Now therefore the Customer hereby agrees to indemnify and hold harmless S D Myers Inc. employees agents officers and its subcontractors, if any from and against any and all losses damage claims attachments judgments and costs of any kind and nature whatsoever relating to damage or destruction of property listed in this proposal loss of production by the Customer caused by or in any manner in connection with the work contracted for in this proposal.

6 The provisions contained in this proposal shall become part of any contract resulting from said proposal and no other terms or conditions other than those stated herein and no agreement or understanding oral or written in any way purporting to modify these terms and conditions whether contained in the Customer's purchase order or elsewhere shall be binding on S D Myers Inc. unless hereafter made in writing and signed by its authorized representative. All proposals negotiations and representations if any made prior to and referenced hereto are merged herein.

S000055

# Certificate of Insurance

**acord**

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER.  
THIS CERTIFICATE DOES NOT AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES LISTED BELOW.

NAME ADDRESS OF GE C

THE CHURCH AGENCY, INC  
411 EAST MARKET ST  
AKRON OHIO 44304

## COMPANIES AFFORDING COVERAGES

COM LETTER **A** UNITED STATES FIDELITY & GUARANTY CO

COMP LETTER **B**

COM LETTER **C**

COM LETTER **D**

COMP LETTER **E**

NAME ADDRESS OF SURED

S D MYERS, INC  
Transformer Consultants  
P O BOX 3575  
AKRON OHIO 44310

This certificate certifies that the policies listed below have been issued to the insured and are in full force and effect as of the date of issuance. It is not to be construed as a contract of insurance. The actual terms, coverages, amounts, conditions, exclusions and limitations of such policies are set forth in the policies themselves.

COMP LETTER	TYPE OF SURGE	OCCUMBE	POLICY NUMBER	Limits of Liability in Thousands (\$000)		
				BODILY INJURY AND PROPERTY DAMAGE	COMBINED SINGLE OCCASION	AGGREGATE
A	<b>GENERAL LIABILITY</b>	MP022746790  (BROAD FORM)	11/12/86	BODILY INJURY	\$	\$
	PROPERTY DAMAGE			\$	\$	
	BODILY INJURY AND PROPERTY DAMAGE COMBINED			\$ 1,000	1,000	
	ROBBERY AND BURGLARY			\$	\$ 1,000	
	<b>AUTOMOBILE LIABILITY</b>	BAP066990374	11/12/86	BODILY INJURY (EACH PERSON)	\$	\$
COMBINED SINGLE OCCASION	\$			\$		
PROPERTY DAMAGE	\$			\$		
BODILY INJURY AND PROPERTY DAMAGE COMBINED	\$ 1,000			\$		
	<b>EXCESS LIABILITY</b>			BODILY INJURY AND PROPERTY DAMAGE COMBINED	\$	\$
	<b>WORKERS COMPENSATION and EMPLOYERS LIABILITY</b>			STANDARD	\$	\$
	<b>OTHER</b>					

DESCRIPTION OF OPERATION LOCATIONS/VENUES

VERBAL OTW

MORRISVILLE PA

**Cancellation** Should any of the above described policies be cancelled before the expiration date thereof the issuing company will endeavor to mail 10 days written notice to the below named certificate holder but failure to mail such notice shall impose no obligation or liability of any kind upon the company

NAME ADDRESS OF CERTIFICATE HOLDER

A E STALEY MFG COMPANY  
ATTN MARK MERRILL  
E POST ROAD  
MORRISVILLE PA 19067

DATE ISSUED

MARCH 6 1986

*Thomas E. Brant* VP

UT OR ZED RE ESE E

S000056

630230

STATE OF OHIO  
THE INDUSTRIAL COMMISSION & BUREAU OF WORKERS COMPENSATION  
COLUMBUS OHIO 43215  
CERTIFICATE OF PREMIUM PAYMENT

THIS IS TO CERTIFY AND NOTICE IS HEREBY GIVEN TO ALL PERSONS that on date hereof the below named employer paid into the State Insurance Fund premium as provided by law and that the employee and employer is entitled to the rights and benefits of said fund during the period below set forth. MUST BE POSTED IN A CONSPICUOUS PLACE

RISK NO. AND EMPLOYER

PERIOD SPECIFIED BELOW

Risk 400501  
S D IYI S Inc  
2737 Front St  
Cuy Falls Ohio 44221

0-11-50 to 07-31-50

FORM DP 22

*James F. Mayfield*  
ADMINISTRATOR

5000057



*Dedicated to conserving our nation's natural oil resources  
and prolonging the life of transformers nationwide*

P O Box 4724  
Akron Ohio 44310 0575  
Phone (216) 929 2847

Attention

RE P O #

Location of Work

This is to acknowledge receipt of the above captioned purchase order and to thank you for the opportunity to serve you by providing the service authorized. Please note the appropriate items checked.

- ☐ No documentation required as services were performed outside of your plant
- ☒ Insurance certificate and workmen's compensation enclosed
- ☐ Insurance previously on file workmen's compensation enclosed

Please contact the department indicated below should there be any questions regarding the scheduling of the work to be performed.

- |   |  |
|---|--|
| <input type="checkbox"/> Akron Sales      | <input type="checkbox"/> IB Coatings               |
| <input type="checkbox"/> West Coast Sales | <input checked="" type="checkbox"/> Field Services |
| <input type="checkbox"/> Rerefining       | <input type="checkbox"/> Houston Sales             |

- ☐ Please note that this acknowledgement is issued against your verbal purchase order as indicated. Therefore should any purchase order be required before payment can be made please have one issued and same forwarded to this office so that our files may be complete.

Again we thank you for the opportunity to serve you and we trust that the above information will complete your files.

Very truly yours

*J. Miner*  
Accounting Dept

Kernan 4/2/86 #2

**UNIFORM HAZARDOUS WASTE MANIFEST**

21 Generator's US EPA ID No  
Manifest Document No  
86-018  
2 Page 1  
Information in the shaded areas is not required by Federal law

3 Generator's Name and Mailing Address <b>XXXBXXMX A E STALEY MFG CO - E Post Rd</b> <b>Morrisville PA 19067</b>		A State Manifest Document Number <b>86-018</b>
4 Generator's Phone ( 215 ) 295-5011		B State Generator's ID Same
5 Transporter 1 Company Name <b>S D MYERS INC</b>	6 US EPA ID Number <b>OH-DO44946127</b>	C State Transporter's ID
7 Transporter 2 Company Name	8 US EPA ID Number	D Transporter's Phone <b>216/ 929-2847</b>
9 Designated Facility Name and Site Address <b>S D MYERS INC</b> <b>1500 Commerce Dr</b> <b>Stow OH 44224</b>		E State Transporter's ID
10 US EPA ID Number <b>OH-DO44946127</b>		F Transporter's Phone
		G State Facility's ID <b>OH-DO44946127</b>
		H Facility's Phone <b>216/ 929-2847</b>

11 US DOT Description (Including Proper Shipping Name Hazard Class and ID Number)		12 Containers		13 Total Quantity	14 Unit Wt/Vol	I Waste No
No	Type	No	Type			
a	X	Waste - Polychlorinated Biphenyl Transformer oil containing under 500 PPM PCB RQ ORM-E UN2315	21	DM	10500 lbs 21	G
b						
c						
d						

J Additional Descriptions for Materials Listed Above	K Handling Codes for Wastes Listed Above
--	--

15 Special Handling Instructions and Additional Information

6 GE E OR CERT C TO

Printed/Typed Name <b>A E STALEY / MARK MCCREY</b>	Signature <i>[Signature]</i>	Month Day Year <b>4 2 86</b>
17 Transporter 1 Acknowledgement of Receipt of Materials		
Printed/Typed Name <b>S D MYERS INC</b>	Signature <i>[Signature]</i>	Month Day Year <b>4 2 86</b>
18 Transporter 2 Acknowledgement of Receipt of Materials		
Printed/Typed Name	Signature	Month Day Year

19 Discrepancy Indication Space

20 Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in item 19		
Printed/Typed Name <b>John P Wunderle Jr</b> <b>S D MYERS, INC.</b>	Signature <i>[Signature]</i>	Month Day Year <b>4 2 86</b>



RETROFILE #2

4-2-86

to typ (Form d g d f o el t (12 p tch) typew te )

Form App d OMB No 2000 0404 E p es 7 31 86

UNIFORM HAZARDOUS  
WASTE MANIFEST

21 Generators US EPA ID No

Manifest Document No

86-018

2 Page 1  
ofInformation in the shaded areas  
is not required by Federal law

3 Generator's Name and Mailing Address

~~XXXXXXXX~~ A E STALEY MFG CO - E Post Rd  
Morrisville, PA 19067A State Manifest Document Number  
86-018

4 Generator's Phone ( 215 ) 295-5011

B State Generator's ID  
Same

5 Transporter 1 Company Name

S D MYERS INC

6 US EPA ID Number

OH-DO44946127

C State Transporter's ID

D Transporter's Phone 216/ 929-2847

7 Transporter 2 Company Name

8 US EPA ID Number

E State Transporter's ID

F Transporter's Phone

9 Designated Facility Name and Site Address

S D MYERS INC

1500 Commerce Dr

Stow, OH 44224

10 US EPA ID Number

OH-DO44946127

G State Facility's ID

OH-DO44946127

H Facility's Phone

216/ 929-2847

11 US DOT Description (Including Proper Shipping Name Hazard Class and ID Number)

12 Containers

No

Type

13  
Total  
Quantity14  
Unit  
Wt/Vol1  
Waste Noa X Waste - Polychlorinated Biphenyl Transformer  
oil containing under 500 PPM PCB RQ ORM-E  
UN2315.

21

DM

21

G

b

c

d

J Additional Descriptions for Materials Listed Above

K Handling Codes for Wastes Listed Above

15 Special Handling Instructions and Additional Information

16 GENERATOR'S CERTIFICATION I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations

Printed/Typed Name

Signature

Date  
Month Day Year

17 Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name

S. D. MYERS, INC.

Signature

X

Date  
Month Day Year  
7 2 86

18 Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name

Signature

Date  
Month Day Year

19 Discrepancy Indication Space

20 Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19

Printed/Typed Name

S. D. MYERS, INC.

Signature

X

Date  
Month Day Year

GENERATOR

TRANSPORTER

FACILITY

k w l d g m n B l l L d g h b d d t h O B l l L d  
 copy d p l c a c o g h p p r t y m d h d t d d t t y f i g c o d

1986 BY TRUCK ☒ FREIGHT ☐ Shipper's No \_\_\_\_\_

(M                      ad                      q ee— F   p po                      l                      on only)

1500 COMMERCE DR

State of OHIO County of SUMMIT

Delivering Carrier \_\_\_\_\_ Vehicle or Car Initial \_\_\_\_\_ No \_\_\_\_\_

T t ly bow med  
m p p y led d  
bed p k ged marked nd labeled  
nd p oper cond ion for l anspor  
on cord ng l h pplicable eg  
la ion l t Depa me of Transpora  
ion

Permanent post-office address of holder

4

M E M O

April 8 1986

TO R L Dickens r  
FROM M O Merrell

SUBJECT PCB Transformer Retrofill & Annual PCB Report - Morrisville Plant

On Wednesday, April 8rd 1986 the Morrisville Plant had its second PCB transformer retrofill operation. As before the retrofill was performed by the S D Myers Inc /Transformer Consultants company. The work performed was to have two (2) transformers retrofilled with new oil which would then reduce the amounts of PCB's in the units so that they could be reclassified as Ncr-PCB transformers.

Oil samples of the two (2) units will be taken in 90 days (early July) and the results of these samples will then determine the correct classification of the transformers. We are 100% sure that these units will be well below the 50ppm limit and will therefore be reclassified as Ncr-PCB.

Attached for your records are the following:

- 1) Hazardous Waste Manifest for the 4/8/86 retrofill  
This is to transport the oil from Staley to S D Myers
- 2) Hazardous Waste Manifest for the 10/23/85 retrofill  
This is to transport the oil from S D Myers to the disposal facility in Arkansas

There was a total of 1155 gallons of new oil used and 1155 gallons of PCB contaminated oil taken away. This is compared to the 1800 gallons that was used during the 10/23/85 retrofill.

I have been told by the S D Myers company that a Certificate of Destruction will be sent to me when the oils are destroyed in Arkansas. To date I have not received these papers but as soon as I do I will be forwarding them to you.

Again the job went very well with the total time to retrofill the two (2) units taking approx. 8 hours. Again as I stated in my previous letter I would recommend the S D Myers/Transformer Consultants company for doing similar work in any of the other Staley facilities.

Also attached for your records is the 1985 Annual Report for PCB's at the Morrisville plant. As stated we now only have eight (8) PCB transformers in the plant. Also we have removed two (2) PCB capacitors from service this year and these are presently in a drum awaiting proper disposal.

If you have any questions concerning the above please contact me at your convenience.

M O Merrell

cc L VanDoren w/att  
R Miller w/att  
R Odea/Transformer Consultants w/att  
L Hennings/W Jones w/att

5000062

TO K J OBUSZEWSKI  
FROM M O MERRELL

DATE 3 - 86

SUBJECT PCB CONTAMINATED TRANSFORMER RETROFILL PROGRAM - AFE JUSTIFICATION

#### SUMMARY

We presently have two (2) transformers which are filled with silicone oil. We currently have data on the milligram (ppm) readings of PCB rate also in excess of 500 PPM but less than 500 PPM (100%). Therefore these transformers are out of service for PCB contamination. The retrofilling process (which is the second step in the two (2) retrofilled units) will reduce the amount of PCB's in the oil to where the transformers will be able to be reclassified as Non-PCB transformers.

#### DISCUSSION

We presently have two (2) transformers which have PCB's in the silicone oil have the following readings

<u>UNIT #</u>	<u>PCB CONTENT - PPM</u>	<u>GALLONS PER UNIT</u>
US-1	46	281
T-6	122	817

Transformer Consultants have provided us with a quote to reduce the PCB's in the two (2) units to levels which will reclassify the units as Non-PCB transformers. This means that when a sample is taken after the retrofilling process the PPM content of PCB's will have to be 44 or less due to the ±10% clause in the government regulations.

If for some reason these PPM readings are not achieved during this retrofilling process, any and all trips for additional retrofills will be performed at NO COST to the A E Staley Co.

Transformer Consultants will provide us with full documentation regarding the shipping, handling and disposal of the contaminated oils. Everything will be done in accordance with all government regulations.

The retrofilling operation will be done during our plant wide shut-down in March of 1986.

#### RECOMMENDATION

Attached is an AFE for an amount of \$15,761.00 to cover the cost of the retrofilling operations plus a 5% contingency to cover the cost of any additional labor or materials. I recommend this AFE be approved as soon as possible so work can be done during the plant wide winter shut-down before we start up this coming spring.

  
M O Merrell

S000063

COST ESTIMATE

TITLE PCP-C ran rated raser line Ret + 1 Pr gram

DATE 3/7/86

COMPILED BY M O Merrel

<u>CODE</u>	<u>DESCRIPTION</u>	<u>MATERIAL COST</u>	<u>LABOR COST</u>	<u>TOTAL COST</u>
EXP	Retr fl i rd		\$14 193	\$14 193
EXP	PA Tax L 6/		\$ 85L	\$ 85L
	Curtirgency C 5/		\$ 710	\$ 710
		=====	=====	=====
	Total Request		\$15,761	\$15,761

S000064

# AUTHORIZATION FOR EXPENDITURE

CLASS

Number

Date

3-7-86

AMOUNT AUTHORIZED

\$ 15 761 00

TITLE

PCB Contaminated Transformer Retrofill Program

PERSON(S) AUTHORIZED TO APPROVE PURCHASES

M O Verrelli

ECONOMIC JUSTIFICATION  
TO BE PREPARED

☐ YES ☒ NO

Description — Purpose — Anticipated Results of Expenditure

This AFE is being submitted for funding to retrofill two (2) PCB contaminated transformers. Transformers US-1 and T-1 are considered contaminated due to them having between 50 and 500 PPM of PCB's in their oil. This retrofilling process which is the second retrofill for these transformers will reduce the PCB levels to below 50 PPM and the transformers can then be reclassified as Non-PCB transformers.

The retrofill process will require a plant power outage and therefore we will schedule the retrofilling operation to take place during the extended winter plant wide shutdown.

Cash Flow	Expense	2nd QTR	Total
Fiscal 86		\$15 761	\$15 761
	Total	\$15 761	\$15 761

Classification Environmental

Not This the d of this p g sed to d l l d Wcr O der Assig me ts d R mo als

## ESTIMATED COST

Acquisition	\$ _____
Improvement New Construction and Equipment	\$ _____
Repairs Maintenance and Relocation	\$ 15 761 00
Special Professional Services	\$ _____
Total Amount Authorized	\$ 15 761 00
Additional Working Capital	\$ _____
Total Direct Investment	\$ _____

## RETURN ON INVESTMENT

Total Direct Investment	\$ _____
Allocated Facilities	\$ _____
Total Investment	\$ _____
Less Sale of Replaced Equip	_____
Investment Credit & Tax on Expensed Portion	\$ _____
Total Net Direct Investment	\$ _____
Annual Increased Income (After Income Taxes)	\$ _____
Less % Return Required On Allocated Facilities	\$ _____
Return on Net Direct Investment	\$ _____

REQU STED BY

REVIEWED & APPROVED BY

REV WED BY CONTROL DIVISION

EXECUTIVE COMMITTEE MINUTES DATED

DATE 3/7/86

DATE 3/10/86

DATE

APPROVED BY DIVISION HEAD

APPROVED BY VICE PRESIDENT

APPROVED BY PRESIDENT OR CHIEF EXECUTIVE OFFICER

SECRETARY

DATE

DATE

DATE

DATE

(

[illegible]

Accounting Opinion by A Livingston *lm*

BUILDING AND MAJOR EQUIPMENT TO BE REMOVED ON THIS AFE

[illegible]

4/17/86  
Copy  
to  
Kendall  
for your EPA file  
Van

File IV K

M E M O

April 8, 1986

TO: R L Dickinson  
FROM: M O Merrell

SUBJECT: PCB Transformer Retrofill & Annual PCB Report - Morrisville Plant

On Wednesday, April 2nd, 1986, the Morrisville Plant had its second PCB transformer retrofill operation. As before the retrofill was performed by the S D Myers Inc /Transformer Consultants company. The work performed was to have two (2) transformers retrofilled with new oil which would then reduce the amounts of PCB's in the units so that they could be reclassified as Non-PCB transformers.

Oil samples of the two (2) units will be taken in 90 days (early July) and the results of these samples will then determine the correct classification of the transformers. We are 100% sure that these units will be well below the 50ppm count and will therefore be reclassified as Non-PCB.

Attached for your records are the following:

- 1) Hazardous Waste Manifest for the 4/2/86 retrofill  
This is to transport the oil from Staley to S D Myers
- 2) Hazardous Waste Manifest for the 10/23/85 retrofill  
This is to transport the oil from S D Myers to the disposal facility in Arkansas

There was a total of 1155 gallons of new oil used and 1155 gallons of PCB contaminated oil taken away. This is compared to the 2800 gallons that was used during the 10/23/85 retrofill.

I have been told by the S D Myers company that a Certificate of Destruction will be sent to me when the oils are destroyed in Arkansas. To date I have not received these papers but as soon as I do I will be forwarding them to you.

Again the job went very well with the total time to retrofill the two (2) units taking approx 8 hours. Again as I stated in my previous letter I would recommend the S D Myers/Transformer Consultants company for doing similar work in any of the other Staley facilities.

Also attached for your records is the 1985 Annual Report for PCB's at the Morrisville plant. As stated we now only have eight (8) PCB transformers in the plant. Also we have removed two (2) PCB capacitors from service this year and these are presently in a drum awaiting proper disposal.

If you have any questions concerning the above please contact me at your convenience.

M O Merrell

cc L VanDoren w/att  
R Miller w/att  
R Odea/Transformer Consultants wo/att  
L Henning/W Jones wo/att

5000067



<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		21 Generator's US EPA ID No <b>86-018</b>		Manifest Document No. <b>86-018</b>		2 Page 1 of Information in the shaded areas is not required by Federal law					
3. Generator's Name and Mailing Address <b>XXXXXXXXX A E STALEY MFG CO - E Post Rd. Morrisville, PA 19067</b> Generator's Phone ( <b>215</b> ) <b>295-5011</b>						A State Manifest Document Number <b>86-018</b>					
						B State Generator's ID <b>Same</b>					
5 Transporter 1 Company Name <b>S D MYERS, INC.</b>				6 US EPA ID Number <b>OH-DO44946127</b>		C State Transporter's ID <b>Same</b>					
7 Transporter 2 Company Name				8 US EPA ID Number		D Transporter's Phone <b>216/ 929-2847</b>					
9 Designated Facility Name and Site Address <b>A. E MYERS, INC. 1500 Commerce Dr Stow, OH 44224</b>				10 US EPA ID Number <b>OH-DO44946127</b>		E State Transporter's ID <b>Same</b>					
						F Transporter's Phone <b>216/ 929-2847</b>					
						G State Facility's ID <b>OH-DO44946127</b>					
H Facility's Phone <b>216/ 929-2847</b>											
11 US DOT Description (Including Proper Shipping Name Hazard Class and ID Number)						12 Containers					
						No	Type				
a. <input checked="" type="checkbox"/> <b>Waste - Polychlorinated Biphenyl Transformer oil containing under 500 PPM PCB RQ, ORH-E, UN2315.</b>						<b>21</b>	<b>DN</b>				
						13 Total Quantity <b>21</b>		14 Unit Wt/Vol <b>G</b>		15 Waste No	
J Additional Descriptions for Materials Listed Above						K Handling Codes for Wastes Listed Above					
15 Special Handling Instructions and Addit onal Information											
16 GENERATOR'S CERTIFICATION I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations											
Printed/Typed Name						Signature					
						<b>X</b>					
17 Transporter 1 Acknowledgement of Receipt of Materials						Date					
Printed/Typed Name <b>S D MYERS, INC</b>						Signature <b>X</b>					
18 Transporter 2 Acknowledgement of Receipt of Materials						Date					
Printed/Typed Name						Signature					
19 Discrepancy Indication Space											
20 Facility Owner or Operator Certification on receipt of hazardous materials covered by this manifest except as noted in Item 19											
Printed/Typed Name <b>S D MYERS, INC</b>						Signature <b>X</b>					
						Date Month Day Year					

Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing classification and the said terms and conditions are hereby agreed to by the shipper and accepted for himself and assigns.

19 86

BY TRUCK ☒ FREIGHT ☐ Shipper's No

(M or et add es of consignee— For purposes of notification only )

Destination **STOW, OH 44224**

State of OHIO

County of SUMMIT

## Route

### Delivering Carrier

Vehicle or Car Initial

4

Subject to Section 7 of conditions of applicable bill of lading if this shipment be delivered the consignee without recourse on the consignor the consignor shall sign the following agreement. The carrier shall not make delivery of this shipment without payment of freight and all other lawful charges.

Per \_\_\_\_\_  
(Signature of Consignor)

If charges are to be prepaid write on  
label her T be Prepaid

Received \$ \_\_\_\_\_  
to apply in prep ymen of the charges on  
the p roperty described herein

Agent or Cashier

Per \_\_\_\_\_  
(The signa ur her knowledges only  
the mount pr paid)

Charges Advanced

**COD SHIPMENT**

Prepaid ☒   
 Collect ☐ \$ \_\_\_\_\_

Collection Fee \_\_\_\_\_

Total Charges \_\_\_\_\_

If the shipment moves between two ports by carrier by water then it requires that the bill of lading shall state whether it is "Carrier or Shipper weight".

Shipper imp lieu of lamp not  
part of bill of lading approved by the De-  
partment of Transportation.

NOTE — While the dependent on value shippers are required to state specifically in writing the agreed or declared value of the property.

THIS SHIPMENT IS CORRECTLY DE  
SCRIBED CORRECT WEIGHT IS

\_\_\_\_\_ LBS

Subject: Verification by the R  
pective W: Weighing and Inspection  
Bur: According to Agreement

Per \_\_\_\_\_

**TOTAL  
PIECES**

The to ensure estom no organ re act in the system the use of eq me of use of the Uniform right  
Ca citation of Sol or the or Set measure of the use of the Uniform Convention

Shopper Per

Agent Per

Permanent pos -o ca address of shipper

S000069

4

This is to certify that the above named  
 is property of the  
 has been packaged in and is  
 and in proper condition for transport  
 in accordance with applicable regu-  
 lations of the Department of Transportation.



## 7

Form Approved OMB No 2000-0404 Expires 7-31-98

**GENERATOR**

GEN PATOR COPY

RECEIVED subject to the conditions and terms in effect on the date of the issue of this Bill of Lading. The property described below in apparent good order except as noted (content and condition of contents of packages unknown) marked, consigned and delivered in accordance with which said carrier (the said carrier being under load throughout its contract) meaning any person or corporation in possession of the property under the contract) agrees to carry to usual place of delivery said destination if on its route otherwise to deliver to another carrier on the route to said destination. It is mutually agreed as to each carrier of all or any of said property or all or any portion of said route to be performed hereunder at any time requested in all or any and property that will service to be delivered on the date of shipment.

Shipper hereby certifies that he is familiar with all the bill of lading terms and conditions in the governing law, regulation and the terms and conditions hereby agreed to by the shipper and accepted for himself and assigns.

From S. D. MYERS, INC.

1500 Commerce Dr Stow Od 44224

19 85

DESIGNATE WITH N (X)

BY TRUCK ☒ FREIGHT ☐ Shipper's No

Carrier

Agent's No

Consigned to ENSCO Inc American Oil Road

(M) addres of consignee—For purposes of notation only)

Destination El Dorado AK 71730

State of

County of

Route

Delivering Carrier

Vehicle or Car Initial

No

No P ges	HM	DESCRIPTION AND CLASSIFICATION Proper Shipping Name, Class and Identification Number per 72.101 72.202 72.203	UN or NA	Wt (Sub Cor)	Cl or R	Check Column	Subject Section 7 of conditions of applicable bill of lading if this shipment be delivered the consignee with- out recourse on the consignee the con- signor shall sign the following statement: The carrier shall not make delivery of the shipment without payment of freight and other lawful charges.
1	X	Waste polychlorinated biphenyl					Pe (Signature of Consignor)
		ORM-E UN2315 RQ liquid greater					If charges be prepaid with or lamp here T be Prepaid
		than 500ppm MANIFEST NO AR-55211					Rceived \$ to apply in prepayment of the charges on the property described herein
		WORK ORDER #112815					Agent or Consigner
		PRODUCT CODE 3282-ZT					P (The signature knowledge only in mount paid)
		PURCHASE ORDER #B30983-31-B-0					C g d need
		*(25) Anderson Clayton Phoenix, AZ FS 85-122 10/19/85					COD SHIPMENT Prepaid <input type="checkbox"/> Collected <input type="checkbox"/> \$ Collection Fee Total Charges
		*(18) Great Salt Lake Mineral & Chemical Ogden UT FS					If the shipment moves between two ports by carrier with the equipment that be filling the tank with Carrier or Shipper's sign
		85-121 10/16/85					Shipper's stamp of stamp not p (bill) lading approved with De- partment T portion
		*(13) Chrysler Corp Marysville, MI FS MI0620919					NOTE—When the depend on value shipper's quoted spec property in the goods or declared the property
		10/27/85					THIS SHIPMENT IS CORRECTLY DE- scribed BY THE WEIGHTS LBS
		2800 gallons pumped directly into tanker A E Staley					Weight of goods on B (including tare weight)
		Morrisville PA FS 85-092 10/27/85					Pm
		*drummed then pumped into tanker					to which goods are the order of the bill of lading with the con- signor's name and address not exceeding 50 lines per page per line
TOTAL PIECES							

S. D. Myers Inc  
El Dorado AK  
Shipper's Pe  
Agent's Pe  
S000071